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SOI Bulletin

Statistics of Income

2008

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Volume 27, Number 4

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SOI BULLETIN

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Volume 27 , Number 4

The *Statistics of Income (SOI) Bulletin* is issued quarterly, in February, May, August, and November, by the Statistics of Income Division of the Internal Revenue Service. The report provides the earliest published annual financial statistics obtained from the various types of tax and information returns filed, as well as information from periodic or special analytical studies of particular interest to students of the U.S. tax system, tax policymakers, and tax administrators. Selected historical and other data tables, previously published in every issue of the *SOI Bulletin*, now are published only in the spring issue of the *Bulletin*. These tables are also available on SOI's pages of the IRS Web site (www.irs.gov/taxstats).

Information on the availability of supplemental data on the topics included in this issue, special tabulations undertaken on a reimbursable basis, or other SOI subjects, may be obtained by telephoning the SOI's Statistical Information Services (202-874-0410), or by writing to the Director, Statistics of Income Division RAS:S, Internal Revenue Service, P.O. Box 2608, Washington, D.C. 20013-2608.

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Inside this Issue

Individual Income Tax Returns, Preliminary Data, 2006

by Brian Balkovic

For 2006, taxpayers filed 138.4 million U.S. individual income tax returns, an increase of 2.9 percent from the 134.5 million returns filed for 2005. In addition, Adjusted Gross Income (AGI) rose 8.4 percent from the previous year to \$8.0 trillion for 2006. Taxable income rose 9.0 percent to \$5.6 trillion. The alternative minimum tax rose 21.3 percent to \$19.3 billion, while total income tax increased 10.6 percent to \$1.0 trillion, and total tax liability rose 10.3 percent to \$1.1 trillion.

High-Income Tax Returns for 2005

by Brian Balkovic

For Tax Year 2005, there were 3,566,125 individual income tax returns that reported Adjusted Gross Income (AGI) of \$200,000 or more, and 3,584,012 with expanded income of \$200,000 or more. These returns represent, respectively, 2.654 percent and 2.667 percent of all returns filed for 2005. Based on AGI, the number of high-income returns for 2005 measured in current-year dollars was 66.8 times as large as for 1977. Measured in 1976 constant dollars, the number of returns for 2005 was only 11.3 times the number for 1977. For Tax Year 2005, the income share of high AGI returns in constant dollars increased to 0.386 percent from 0.330 percent for 2004.

For 2005, of the 3,566,125 income tax returns with AGI of \$200,000 or more, 7,389 (0.207 percent) had no U.S. income tax liability; and 4,224 (0.118 percent) had no worldwide income tax liability. For 2004, of the 3,021,435 returns with AGI of \$200,000 or more, 2,833 (0.094 percent) had no U.S. income tax liability; and 2,420 (0.080 percent) had no worldwide income tax liability. For 2005, of the 3,584,012 returns with expanded income of \$200,000 or more, 10,680 (0.298 percent) had no U.S. income tax liability; and 5,420 (0.151 percent) had no worldwide income tax liability. For 2004, of the 3,067,602 returns with expanded income of \$200,000 or more, 5,028 (0.164 percent) had no U.S. income tax liability; and 4,101 (0.134 percent) had no worldwide income tax liability. Thus, whether measured by absence of U.S. income tax or absence of worldwide income

tax, under both AGI and expanded income concepts, the proportion of nontaxable high-income returns increased between 2004 and 2005.

Individual Noncash Contributions, 2005

by Janette Wilson

For Tax Year 2005, 25.4 million individual income taxpayers reported \$48.1 billion in deductions for noncash charitable contributions. Of these, 6.6 million reported a total of \$41.1 billion in noncash charitable contributions in excess of \$500, as shown on Form 8283. This total represents an increase of 10.4 percent since Tax Year 2004, in which \$37.2 billion were reported. Due to changes in the 2005 tax law restricting most automobile deductions to the lesser of the fair market value or the gross proceeds from the sale of the vehicle, the number of car donations decreased by 67 percent between 2004 and 2005, and the amounts claimed from these donations decreased by 80.6 percent.

Accumulation and Distribution of Individual Retirement Arrangements, 2004

by Victoria L. Bryant

For 2004, 14.7 million individual income taxpayers contributed approximately \$48.7 billion to Individual Retirement Arrangements (IRAs). In addition, they reported \$214.9 billion as rollovers into IRAs, usually from employer-sponsored plans, such as 401(k) plans. At year-end, approximately 50.9 million taxpayers held \$3.3 trillion in IRAs based on fair market value.

Almost 90 percent of the yearend fair market value, 89.6 percent (\$3.0 trillion), was invested in traditional IRA plans. Simplified Employee Pension (SEP) plans accounted for 5.1 percent (\$169 billion); Roth IRA plans accounted for 4.2 percent (\$140 billion); and Savings Incentive Match Plans for Employees (SIMPLE) plans accounted for 1.0 percent (\$34 billion). Even though traditional IRAs accounted for most of the yearend fair market value, Roth IRA contributions accounted for almost one-third of contributions for the year, 30.2 percent (\$14.7 billion); SEP plans accounted for 28.2 percent (\$13.8 billion); traditional IRA plans accounted for 25.9 percent (\$12.6 billion); and SIMPLE plans accounted for 15.6 percent (\$7.6 billion).

For Tax Year 2004, 12.3 million taxpayers withdrew \$140 billion from IRAs, of which \$133 billion were from traditional IRA plans; \$4.5 billion were

from SEP plans; \$1.9 billion were from Roth plans; and \$0.2 billion were from SIMPLE plans.

The One-Time Received Dividend Deduction

by *Melissa Redmiles*

Approximately 840 mostly large corporations repatriated nearly \$362 billion from their controlled foreign corporations (CFCs) and deducted about \$265 billion of these dividends from their taxable incomes between Tax Years 2004 and 2006 due to the one-time dividend received deduction enacted in the American Jobs Creation Act of 2004. The pharmaceutical and medicine manufacturing industry brought home roughly 29 percent of the repatriated dividends. CFCs incorporated in the Netherlands distributed more than a quarter of the repatriated earnings. Many of the qualifying dividends have already been invested in allowable domestic investments deemed likely to promote U.S. growth, or they will be invested shortly.

Federal Estate Tax Returns Filed for 2004 Decedents

by *Brian G. Raub*

An estimated 42,239 Federal estate tax returns were filed for 2004 decedents with gross estates greater than \$1.5 million. These estates reported a combined \$185.9 billion in total gross estate. The largest asset type in the overall portfolio of these decedents was publicly traded stock, valued at \$51.5 billion, followed by investment real estate and tax-exempt bonds, valued at \$27.2 billion and \$18.3 billion, respectively. Estates also reported about \$3.0 billion of assets held in family limited partnership interests (FLPs). Valuation discounts taken against total assets accounted for \$6.5 billion. Of this total, \$3.5 billion were reported on assets held in FLPs. Approximately 20.6 percent of returns filed for 2004 decedents reported a bequest to charity. Larger estates were more likely to report a charitable bequest and, on average, left a larger share of total gross estate to charity. After accounting for charitable bequests, marital bequests, and other deductions and credits, about 45.7 percent of returns filed for 2004 decedents reported estate tax liability. These 19,294 returns reported \$22.2 billion in net estate tax.

The Development of Taxable REIT Subsidiaries, 2001-2004

by *Thornton Matheson*

The number of taxable Real Estate Investment Trust (REIT) subsidiaries increased steadily in the 4 years following the enactment of the REIT Modernization Act, which Congress passed in December 1999 and took effect in 2001. Some 379 taxable REIT subsidiaries (TRSs) filed Form 8875 and Form 1120 in 2001, after which TRS filings rose to 704 in 2004. During this time, total TRS assets grew from \$16.8 billion to \$68.2 billion, and total TRS income from \$6.9 billion to \$16.2 billion. Total TRS income also turned from negative to positive during this period, rising from -\$190 million in 2001 to \$1.2 billion in 2004. Total taxes paid rose from \$84 million, 0.9 percent of gross receipts, in 2001 to \$388 million, 2.2 percent of gross receipts, in 2004. TRSs that converted from pre-existing entities were more likely than newly established TRSs to have negative net income. However, they also paid higher taxes relative to gross receipts than newly established TRSs (2.4 percent versus 0.3 percent).

In the Next Issue

The following articles are tentatively planned for inclusion in the summer 2008 issue of the *Statistics of Income Bulletin*, scheduled to be published in August 2008:

- Gift Tax Data, Filing Years 2005 and 2006;
- Foreign Controlled Domestic Corporations, 2005;
- S Corporation Returns, 2005;
- Controlled Foreign Corporations, Tax Year 2005;
- Foreign Tax Credit, 2004;
- Personal Wealth, 2004; and
- State and Local Unincorporated Business Income.

Individual Income Tax Returns, Preliminary Data, 2006

by Brian Balkovic

For 2006, taxpayers filed 138.4 million U.S. individual income tax returns, an increase of 2.9 percent from the 134.5 million returns filed for 2005. Adjusted Gross Income (AGI) increased from the previous year by 8.4 percent to \$8.0 trillion for 2006. Taxable income increased 9.0 percent to \$5.6 trillion; the alternative minimum tax rose 21.3 percent to \$19.3 billion; total income tax increased by 10.6 percent to \$1.0 trillion; and total tax liability rose by 10.3 percent to \$1.1 trillion.

Figure A shows that the largest component of AGI, salaries and wages, increased 6.5 percent to \$5,578.1 billion for Tax Year 2006, while the next largest component of AGI, net capital gains, rose by 13.4 percent to \$685.3 billion. Other income items with notable percentage changes included capital gain distributions (part of net capital gains), which increased from \$35.5 billion for 2005 to \$62.3 billion for 2006, partnership and S corporation net income, which increased by 10.2 percent to \$468.1 billion, and ordinary dividends, which increased 21.0 percent to \$186.0 billion.

Of this dividend total, about 70 percent were reported as qualified dividends. Qualified dividends, which receive preferential tax rates, were reported on 26.5 million returns and totaled \$130.1 billion, an increase of 16.6 percent from 2005. Taxable interest income rose by 37.7 percent to \$192.8 billion. For 2006, taxable pensions and annuities, the fourth largest income item, increased 7.6 percent to \$460.6 billion.

The other items related to retirement, taxable Social Security benefits and IRA distributions, also rose for 2006, by 16.2 percent and 11.9 percent, respectively. Declining income items included unemployment compensation at \$26.8 billion (falling by 4.4 percent) and farm net income, which decreased by 9.1 percent from Tax Year 2005.

Statutory adjustments to total income increased 5.7 percent to \$110.1 billion for Tax Year 2006. The largest statutory adjustment was the deduction for

one-half of self-employment tax, representing 20.4 percent of the total. This adjustment to income increased 5.1 percent to \$22.5 billion. The self-employment health insurance deduction increased 2.7 percent to \$18.5 billion. Payments to self-employed retirement (Keogh) plans rose 4.3 percent to \$20.2 billion, while deductible contributions to Individual Retirement Arrangements (IRAs) increased 4.6 percent to \$12.8 billion.

Tax Year 2006 law changes increased the contribution limits for both Roth and traditional IRAs for those age 50 and over (see Changes in Law section for details). The deduction for student loan interest increased 21.9 percent to \$6.2 billion, while the deduction for tuition and fees fell 11.9 percent to \$9.6 billion for Tax Year 2006. This was the first decline in this adjustment since its inception in 2002. Over 351,000 taxpayers who made contributions to qualified health savings accounts took an adjustment totaling nearly \$0.8 billion. The domestic production activities deduction for Tax Year 2006 benefited nearly 403,000 taxpayers for a total deduction of \$3.3 billion (a 54.3-percent increase from 2005).

The Katrina Emergency Tax Relief Act of 2005 continued to provide favorable tax legislation for Tax Year 2006 taxpayers. For instance, taxpayers who housed individuals displaced by Hurricane Katrina could claim up to four additional exemptions totaling \$2,000 (see Changes in Law section for details). An estimated 27,000 returns reported almost 48,500 exemptions for taxpayers providing housing for these victims. Altogether, the amount deducted for total exemptions increased by 6.3 percent from \$842.3 billion for 2005 to \$895.7 billion for 2006. This increase is larger than usual because of the change in the law allowing high-income taxpayers who previously were unable to take any exemption deduction to take a \$1,100 deduction per exemption for 2006 (see Changes in Law section for details).

Total deductions, the sum of the standard deductions and total itemized deductions (after limitation), equaled \$1,793.7 billion, an increase of 7.7 percent from Tax Year 2005. The number of returns claiming the standard deduction increased 2.0 percent, accounting for 62.7 percent of all returns filed and 34.1 percent of the total deductions amount.¹ Mostly due

Brian Balkovic is an economist with the Individual Returns Analysis Section. This data release was prepared under the direction of Jeff Hartzok, Chief, Individual Returns Analysis Section.

¹ The remaining 1.9 percent of the returns did not need to claim either a standard deduction or itemized deductions because no AGI was reported.

Individual Income Tax Returns, Preliminary Data, 2006

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Figure A

Individual Income Tax Returns, Preliminary Data: Selected Income and Tax Items, Tax Years 2005 and 2006

[Money amounts are in thousands of dollars]

Item	Number of returns			Amount		
	2005	2006	Percentage change	2005	2006	Percentage change
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns, total	134,462,537	138,420,499	2.9	N/A	N/A	N/A
Form 1040 returns	81,144,182	83,518,153	2.9	N/A	N/A	N/A
Form 1040A returns	31,607,574	32,250,392	2.0	N/A	N/A	N/A
Form 1040EZ returns [1]	21,710,782	22,651,954	4.3	N/A	N/A	N/A
Electronically-filed returns [2]	74,813,073	81,536,629	9.0	N/A	N/A	N/A
Adjusted gross income (less deficit)	134,462,537	138,420,499	2.9	7,363,648,396	7,982,660,690	8.4
Salaries and wages	114,595,809	116,832,397	2.0	5,236,515,411	5,578,112,649	6.5
Taxable interest	59,326,291	62,500,172	5.3	140,024,777	192,779,487	37.7
Tax-exempt interest [3]	4,469,929	6,036,087	35.0	54,410,697	69,505,527	27.7
Ordinary dividends	31,089,911	31,538,899	1.4	153,736,864	185,974,188	21.0
Qualified dividends	25,797,647	26,527,893	2.8	111,592,163	130,083,446	16.6
State income tax refunds	22,281,894	23,117,093	3.7	20,961,408	22,670,071	8.2
Alimony received	457,751	437,222	-4.5	7,943,058	7,854,640	-1.1
Business or profession net income	15,702,731	16,171,389	3.0	300,591,401	316,776,424	5.4
Business or profession net loss	5,335,832	5,464,904	2.4	43,083,206	47,456,970	10.2
Net capital gain [4]	16,048,768	17,884,072	11.4	604,352,228	685,331,194	13.4
Capital gain distributions [4]	13,447,772	14,581,370	8.4	35,457,864	62,333,008	75.8
Net capital loss	9,994,323	8,612,023	-13.8	22,075,818	18,691,022	-15.3
Sales of property other than capital assets, net gain	863,391	848,344	-1.7	11,421,195	12,220,069	7.0
Sales of property other than capital assets, net loss	810,196	828,441	2.3	7,747,570	9,275,159	19.7
Taxable Individual Retirement Arrangement distributions	9,462,567	10,064,480	6.4	111,709,278	125,057,748	11.9
Taxable pensions and annuities	23,549,681	24,467,625	3.9	428,025,371	460,647,534	7.6
Rent and royalty net income	5,664,697	5,607,719	-1.0	74,425,992	77,337,722	3.9
Rent and royalty net loss	5,140,616	5,203,752	1.2	48,353,595	55,133,308	14.0
Partnership and S corporation net income	4,543,703	4,516,531	-0.6	424,863,423	468,113,804	10.2
Partnership and S corporation net loss	2,256,974	2,305,876	2.2	61,665,756	65,866,290	6.8
Estate and trust net income	460,575	503,385	9.3	15,159,317	17,404,639	14.8
Estate and trust net loss	30,538	33,932	11.1	756,271	738,487	-2.4
Farm net income	631,116	564,085	-10.6	9,237,072	8,395,511	-9.1
Farm net loss	1,356,681	1,400,682	3.2	19,842,812	22,519,021	13.5
Unemployment compensation	7,943,765	7,457,645	-6.1	27,995,669	26,777,624	-4.4
Taxable Social Security benefits	12,808,594	13,946,403	8.9	126,409,367	146,855,542	16.2
Total statutory adjustments	33,421,578	33,832,756	1.2	104,151,627	110,079,073	5.7
Educator expenses	3,562,069	3,205,761	-10.0	893,327	816,224	-8.6
Certain business expenses of reservists, performing artists, and fee-basis government officials	102,683	120,005	16.9	290,381	368,850	27.0
Payments to an Individual Retirement Arrangement	3,293,501	3,286,760	-0.2	12,207,511	12,768,170	4.6
Student loan interest deduction	8,118,415	8,605,148	6.0	5,075,930	6,187,425	21.9
Tuition and fees deduction	4,731,924	4,028,959	-14.9	10,928,436	9,632,076	-11.9
Health savings account deduction	211,766	351,170	65.8	488,782	845,431	73.0
Medical savings account deduction	18,391	17,011	-7.5	40,398	29,908	-26.0
Moving expenses adjustment	1,127,511	1,087,129	-3.6	3,055,362	3,157,994	3.4
Self-employment tax deduction	16,507,523	16,892,682	2.3	21,368,314	22,451,883	5.1
Self-employed health insurance deduction	3,670,561	3,537,194	-3.6	17,982,362	18,469,428	2.7
Payments to a self-employed retirement (Keogh) plan	1,197,774	1,176,905	-1.7	19,406,380	20,243,044	4.3
Penalty on early withdrawal of savings	798,900	1,172,267	46.7	267,260	433,716	62.3
Alimony paid	583,305	578,779	-0.8	8,523,911	8,701,183	2.1
Domestic production activities deduction	317,810	402,710	26.7	2,123,938	3,277,003	54.3
Other adjustments	256,855	136,308	-46.9	1,425,226	1,066,677	-25.2

Footnotes at end of figure.

Individual Income Tax Returns, Preliminary Data, 2006

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Figure A—Continued

Individual Income Tax Returns, Preliminary Data: Selected Income and Tax Items, Tax Years 2005 and 2006—Continued

[Money amounts are in thousands of dollars]

Item	Number of returns			Amount		
	2005	2006	Percentage change	2005	2006	Percentage change
	(1)	(2)	(3)	(4)	(5)	(6)
Total exemptions	269,699,249	276,280,206	2.4	842,320,994	895,678,748	6.3
Total deductions	132,762,014	135,806,268	2.3	1,665,601,292	1,793,667,050	7.7
Total standard deduction	85,109,566	86,788,384	2.0	584,209,412	611,274,926	4.6
Basic standard deduction	85,109,566	86,788,384	2.0	567,428,479	594,041,953	4.7
Additional standard deduction	11,131,858	11,419,381	2.6	16,780,934	17,232,969	2.7
Total itemized deductions (after limitation)	47,652,448	49,017,884	2.9	1,081,391,880	1,182,392,125	9.3
Itemized deductions in excess of limitation	6,322,163	6,827,652	8.0	42,549,206	33,562,088	-21.1
Medical and dental expenses deduction	9,871,839	10,121,720	2.5	66,086,920	69,090,147	4.5
Taxes paid deduction	47,267,305	48,565,862	2.7	390,944,404	423,257,838	8.3
State and local income taxes [5]	45,935,853	46,847,080	2.0	237,687,278	258,058,659	8.6
Income taxes	34,744,476	35,846,674	3.2	220,687,451	239,126,293	8.4
General sales taxes	11,191,378	11,000,405	-1.7	16,999,827	18,932,366	11.4
Interest paid deduction	38,884,591	40,110,187	3.2	390,375,165	450,398,602	15.4
Charitable contributions deduction	41,381,479	41,427,765	0.1	172,025,442	173,018,464	0.6
Taxable income	104,511,849	106,803,674	2.2	5,092,405,537	5,553,096,928	9.0
Alternative minimum tax	4,045,459	4,037,074	-0.2	15,874,227	19,252,710	21.3
Income tax before credits	104,520,737	106,823,754	2.2	982,560,689	1,083,780,725	10.3
Total tax credits [6]	42,426,730	46,331,299	9.2	54,297,474	57,450,072	5.8
Child care credit	6,549,739	6,524,616	-0.4	3,487,785	3,519,410	0.9
Credit for the elderly or disabled	101,227	99,044	-2.2	13,787	14,847	7.7
Child tax credit	26,050,925	25,818,992	-0.9	32,184,128	31,836,114	-1.1
Education tax credits	7,133,854	7,819,470	9.6	6,194,770	7,128,447	15.1
Retirement savings contributions credit	5,365,195	5,261,485	-1.9	962,976	908,521	-5.7
Adoption credit	83,681	90,684	8.4	303,397	334,705	10.3
Residential energy credits	N/A	4,452,576	N/A	N/A	1,023,719	N/A
Foreign tax credit	5,373,540	6,392,372	19.0	8,340,820	9,430,601	13.1
General business credit	225,238	362,918	61.1	658,970	1,114,077	69.1
Prior year minimum tax credit	271,909	334,017	22.8	1,080,361	1,012,865	-6.2
Self-employment tax	16,507,523	16,892,682	2.3	42,728,376	44,895,363	5.1
Total earned income credit (EIC)	23,003,703	23,392,886	1.7	43,091,796	45,364,048	5.3
EIC used to offset income tax before credits	2,911,791	2,983,077	2.4	752,954	808,517	7.4
EIC used to offset other taxes	4,834,823	4,972,285	2.8	4,279,188	4,645,878	8.6
Excess EIC, refundable portion	20,357,850	20,639,026	1.4	38,059,653	39,909,653	4.9
Additional child tax credit	15,334,228	15,723,997	2.5	15,588,969	16,354,979	4.9
Credit for Federal telephone excise tax paid	N/A	97,260,127	N/A	N/A	4,180,071	N/A
Total income tax	90,659,349	92,762,414	2.3	928,263,735	1,026,331,685	10.6
Total tax liability	94,346,561	96,671,006	2.5	970,951,374	1,071,236,902	10.3

N/A—Not applicable.

[1] For 2006, the total number of returns includes Form 1040EZ -T returns.

[2] Included in data for Forms 1040, 1040A, and 1040EZ.

[3] Not included in adjusted gross income.

[4] Includes capital gain distributions reported on Form 1040 and Schedule D.

[5] State and local income taxes are the total of both income taxes and general sales taxes.

[6] Includes EIC used to offset income tax before credits, shown separately later in this figure.

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

Individual Income Tax Returns, Preliminary Data, 2006

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to inflation indexing, the average standard deduction (comprised of the basic and additional standard deductions for age and blindness) increased 2.6 percent from \$6,864 for 2005 to \$7,043 for 2006.

Itemized deductions were claimed on 35.4 percent of all returns filed for 2006 and represented 65.9 percent of the total deductions amount. The average total for itemized deductions (after limitation) was \$24,122, a 6.3-percent increase from the 2005 average of \$22,693. Due to the AGI limitation on itemized deductions, 6.8 million higher-income taxpayers were unable to deduct \$33.6 billion in itemized deductions, a decrease of 21.1 percent from 2005. This large decrease was due to a change in the law that reduced this limitation by one-third for 2006 (see Changes in Law section for details).

The interest paid deduction was the largest deduction, comprising 37.0 percent of total itemized deductions (before limitation). For 2006, it increased 15.4 percent to \$450.4 billion. The Tax Relief and Health Care Act of 2006 extended the election to deduct State and local general sales taxes instead of State and local income taxes. For 2006, an estimated 11.0 million taxpayers took advantage of this, deducting \$18.9 billion.

Including taxpayers who deducted State and local sales taxes, 2.0 percent more taxpayers took a deduction for State and local income and sales taxes, and the total amount of this deduction increased 8.6 percent from 2005 levels. The total taxes paid deduction accounted for 34.8 percent of all itemized deductions and increased 8.3 percent to \$423.3 billion. The deduction for medical and dental expenses went up by 4.5 percent to \$69.1 billion, while the charitable contributions deduction increased slightly, 0.6 percent, to \$173.0 billion for 2006.

Total tax credits used to offset income tax liabilities increased 5.8 percent to \$57.5 billion. About 25.8 million taxpayers claimed \$31.8 billion in child tax credits, down 1.1 percent from \$32.2 billion in 2005. However, the additional child tax credit (a refundable separate credit) increased by 4.9 percent to \$16.4 billion in 2006. The combined \$48.2 billion of the child tax credit and the additional child tax credit represented a slight, 0.9-percent increase from 2005 and was greater than the \$45.4 billion of total EIC (see below).

Other notable percentage increases for major tax credits included a 15.1-percent rise in education tax

credits to \$7.1 billion (as opposed to the decrease in the deduction for tuition and fees cited above) and a 13.1-percent rise in the foreign tax credit to \$9.4 billion. Smaller credits, such as the general business credit and the adoption credit, also had significant increases from 2005, 69.1 percent and 10.3 percent, respectively. The large percentage increase in the general business credit can be partially attributed to the Energy Policy Act of 2005 and the Safe, Accountable, Flexible, Efficient Transportation Act of 2005 (see Changes in Law section for details).

In addition, Tax Year 2006 introduced two new credits: the residential energy credit and the credit for Federal telephone excise taxes previously collected erroneously (see Changes in Law section for details). Taxpayers on nearly 4.5 million returns took advantage of the residential energy credits and reduced their taxes by over \$1.0 billion, while 97.3 million returns claimed credits of \$4.2 billion for the Federal telephone excise tax.

The total earned income credit (EIC) increased 5.3 percent to \$45.4 billion for Tax Year 2006. The portion of the EIC used to offset income tax before credits increased 7.4 percent to \$0.8 billion, and the portion of the EIC used to offset other taxes (such as the self-employment tax) rose 8.6 percent to \$4.6 billion. The largest part of the EIC, the refundable portion, was treated as a refund and paid directly to taxpayers who had no tax liability against which to apply the credit. The refundable portion of the EIC increased 4.9 percent to \$39.9 billion for 2006.

The comparisons of data for Tax Years 2005 and 2006 in this article are based on the preliminary estimates for both years. A few income and tax items tend to be understated in preliminary estimates; therefore, comparisons based on preliminary estimates for one year and final estimates for the previous year could be misleading. Comparisons based entirely on preliminary estimates reduce the likelihood of misinterpretation of the data and afford a more accurate representation of year-to-year changes. Final statistics for Tax Year 2005 are available in the Fall 2006 issue of the *Bulletin*.

Changes in Law

In general, the definitions used in this article are the same as those in *Statistics of Income—2005, Individual Income Tax Returns*. The following is a partial list of tax law and Internal Revenue Service admin-

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istrative changes that had a major bearing on the Tax Year 2006 preliminary data presented in this article.

Additional Child Tax Credits—Modifications were made to the additional child tax credit for 2006. In Tax Year 2005, the credit limit based on earned income was 15 percent of a taxpayers earned income that exceeded \$11,000. For 2006, the limit was 15 percent of a taxpayer's earned income that exceeded \$11,300.

Alternative Minimum Tax (AMT)—For Tax Year 2006, the minimum exemption rose to \$62,550 for a married couple filing a joint return, up from \$58,000 in 2005, and to \$42,500 for singles and heads of household, up from \$40,250, and \$31,275 from \$29,000 for a married person filing separately.

Earned Income Credit—The maximum amount of the earned income credit increased, as did the amounts of earned income and investment income an individual could have and still claim the credit. The maximum amount of investment income (interest, dividends and capital gain income) a taxpayer could have and still claim the credit increased to \$2,800 from \$2,700. The maximum credit for taxpayers with no qualifying children increased to \$412 from \$399. For these taxpayers, earned income and AGI had to be less than \$12,120 (\$14,120 if married filing jointly) to get any EIC. For taxpayers with one qualifying child, the maximum credit increased \$85 to \$2,747, and, for taxpayers with two or more qualifying children, the maximum credit increased to \$4,536 from \$4,400. To be eligible for the credit, a taxpayer's earned income and AGI had to be less than \$32,001 (\$34,001 for married filing jointly) for one qualifying child, or less than \$36,348 (\$38,348 for married filing jointly) for two or more qualifying children.

Exemption Amount—For Tax Year 2006, the exemption amount increased by \$100 to \$3,300. Taxpayers could have lost a portion of their exemption benefits if their adjusted gross incomes were above certain amounts (\$112,875 married persons filing separately, \$150,500 single individuals, \$188,150 for heads of household, and \$225,750 for married persons filing jointly or qualifying widow(er)s). For 2006, a taxpayer could lose no more than two-thirds of the dollar amount of their exemption, so the amount of each exemption could not be reduced to less than \$1,100. For 2005 and previous years, exemption amounts could be limited to zero.

Credit for Federal Telephone Excise Tax—Taxpayers who were billed after February 28, 2003, and before August 1, 2006, for Federal telephone excise tax on long distance or bundled service may have taken credit for those payments on their Tax Year 2006 income tax returns. Individuals were eligible to receive this credit if they had not received a refund from their service providers. They could claim a credit for these telephone excise payments even if they had no income tax liability. Taxpayers could request either a standard amount based on the number of exemptions claimed on their returns (number of exemptions: 0 = \$0, 1 = \$30, 2 = \$40, 3 = \$50, 4 or more = \$60), or they could claim the actual amounts as shown on their long distance telephone records. Individuals who did not otherwise have to file an income tax return filed a Form 1040EZ-T, *Request for Refund of Federal Telephone Excise Tax*, in order to obtain their refunds. A total of 739,206 Form 1040EZ-T returns were filed for Tax Year 2006.

General Business Credits—The Energy Tax Incentives Act of 2005 and the Safe, Accountable, Flexible, Efficient Transportation Act of 2005 provided tax incentives for energy efficient buildings and appliances, alternative and clean fuel vehicle credits, and other incentives and credits related to energy production and excise taxes. Of these, the new alternative motor vehicle credit had a large effect on the statistics for the general business credit for Tax Year 2006. A total of 145,000 sole proprietorships reported over \$291.0 million for the tentative alternative motor vehicle credit.

Health Savings Account Deduction—For Tax Year 2006, the maximum HSA deduction increased by \$50 to \$2,700 (\$5,450, if family coverage, up from \$5,250). These limits were \$700 higher if the taxpayer was age 55 or older.

Katrina Emergency Tax Relief Act of 2005—The new law provides an additional exemption of \$500 in taxable years 2005 or 2006 for each Hurricane Katrina displaced individual claimed by the taxpayer. The total additional exemption claimed for all years cannot exceed: \$2,000 for married taxpayers filing jointly, \$1,000 for married taxpayers filing separately, and \$2,000 for all other taxpayers. A Hurricane Katrina displaced individual is a person (1) whose main home on August 28, 2005, was in the Hurricane Katrina disaster area, (2) who was displaced from the home, and (3) who was provided housing free of

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charge in the taxpayer's main home for a period of at least 60 consecutive days which ended in the taxable year in which the exemption was claimed. The additional exemption is not subject to the income-based phaseouts applicable to personal exemptions, and is allowed as a deduction in computing alternative minimum taxable income.

Kiddie Tax—For Tax Year 2006, the age limit for children who received taxable income and needed to figure tax using their parent's higher marginal rates increased from 14 to 18. Also, the amount of taxable investment income a child could have before being taxed at their parents' rate rose to \$1,700, up from \$1,600. Because of the age change, the number of children filing Form 8615 increased from 142 thousand to 331 thousand. The kiddie tax paid on these returns increased 107.3 percent to \$645.2 million for 2006.

Indexing—The following items increased due to indexing for inflation: personal exemption amounts, basic standard deduction amounts, tax bracket boundaries, beginning income amounts for limiting certain itemized deductions and for the reduction of personal exemption deductions. The maximum amount of earnings subject to self-employment tax increased based on the percentage change in average covered earnings.

Individual Retirement Arrangement Deduction—For 2006, the contribution limit for Roth and traditional IRAs increased to \$5,000, up from \$4,500 in 2005, for taxpayers age 50 or over. For taxpayers under 50, the limit remained unchanged at \$4,000. The \$10,000 phaseout range for IRA deductions for those covered by a retirement plan began at income of \$75,000 if married filing jointly or a qualifying widow(er), up from \$70,000 in 2005. It remained at \$50,000 for single person or head of household and at \$0 for a married person filing a separate return. Military members serving in combat zone localities could use tax free combat pay in figuring how much to contribute to a Roth or traditional IRA. This allowed members of the military with no taxable earned income to make contributions, unlike in previous years.

Limit on Itemized Deductions Increased—Taxpayers who had adjusted gross income above

\$150,500 (\$75,250 if married filing separately) could have lost part of their deduction for itemized deductions. This was an increase from 2005 amounts of \$145,950 (\$72,975 if married filing separately). For Tax Year 2006, the amount by which the deduction was reduced was only two-thirds of the amount of the reduction that would have otherwise applied (for 2005 and previous years).

Residential Energy Credit—For 2006, a taxpayer could receive a 10 percent credit for buying qualified energy efficiency improvements for their main home. The maximum nonbusiness energy property credit for all tax years is \$500, and no more than \$200 of the credit can be attributable to expenses for windows. An estimated 45 thousand taxpayers took an additional 30 percent credit for cost related to residential energy efficient property (qualified solar electric costs, solar water heating costs, and fuel cell costs) totaling \$44.0 million. Also, the credit for cost related to residential energy-efficient property was not limited to \$500.

Standard Deduction Amount Increased—The standard deduction for people who did not itemize deductions on Schedule A of Form 1040 was, in most cases, higher for 2006 than it was in 2005. The amount depended on filing status, being 65 or older or blind, and whether an exemption could be claimed for a taxpayer by another person. For 2006, the standard deduction increased to \$10,300 for joint filers, up from \$10,000 in 2005. For single filers and married filing separately the deduction amount increased to \$5,150. For heads of households, the deduction was \$7,550.

Data Sources and Limitations

The preliminary statistics in this data release are based on a sample of individual income tax returns (Forms 1040, 1040A, and 1040EZ including electronically filed returns) filed during Calendar Year 2007. Returns in the sample were stratified based on: (1) the larger of positive income or negative income; (2) the size of business and farm receipts; (3) the presence or absence of specific forms or schedules; and (4) the usefulness of returns for Treasury Department tax modeling purposes.² Returns were then selected at rates ranging from 0.1 percent to

² Returns in the sample were stratified based on the presence or absence of one or more of the following forms or schedules: Form 2555, Foreign Earned Income; Form 1116, Foreign Tax Credit (Individual, Fiduciary, or Nonresident Alien Individual); Schedule C, Profit or Loss from Business (Sole Proprietorship); and Schedule F, Profit or Loss from Farming.

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100 percent. The preliminary Tax Year 2006 data are based on a sample of 243,548 returns and an estimated final population of 138,503,310 returns. The corresponding sample and population for the preliminary 2005 data were 231,171 and 134,577,117 returns, respectively.

Since the data presented here are estimates based on a sample of returns filed, they are subject to sampling error. To properly use the statistical data provided, the magnitude of the potential sampling error must be known; coefficients of variation (CVs) are used to measure that magnitude. The reliability of estimates based on samples, and the use of coef-

ficients of variation for evaluating the precision of estimates based on samples, are discussed in the appendix to this issue of the *Bulletin*.

While the preliminary estimates are intended to represent a full year of taxpayer reporting, they are actually based on returns processed for tax administration purposes, in the case of 2006 returns, between January and late September of 2007. In general, returns processed during the remainder of each year tend to have somewhat different characteristics compared to returns processed earlier. These characteristics include, for example, disproportionately large amounts of investment income, passive losses, and alternative minimum tax.

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Table 1. Individual Income Tax Returns, Tax Year 2006 Preliminary Data: Selected Income and Tax Items, by Size of Adjusted Gross Income

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

Item	All returns	Size of adjusted gross income					
		Under \$15,000 [1]	\$15,000 under \$30,000	\$30,000 under \$50,000	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Number of returns, total	138,420,499	37,614,447	29,648,886	24,906,995	30,052,882	12,109,523	4,087,767
Form 1040 returns	83,518,153	14,582,112	12,373,341	15,141,911	25,392,622	11,940,400	4,087,767
Form 1040A returns	32,250,392	9,906,316	11,931,339	6,694,879	3,571,505	146,356	0
Form 1040EZ returns [2]	22,651,954	13,126,017	5,344,207	3,070,207	1,088,755	22,766	0
Electronically-filed returns [3]	81,536,629	20,317,735	18,863,279	15,639,751	18,020,528	6,834,881	1,860,452
Adjusted gross income (less deficit)	7,982,660,690	188,623,915	655,386,215	973,569,175	2,123,893,982	1,610,028,478	2,431,158,925
Salaries and wages:							
Number of returns	116,832,397	27,988,707	25,291,726	22,183,773	26,927,990	10,919,775	3,520,432
Amount	5,578,112,649	219,570,526	532,165,023	801,742,594	1,677,698,996	1,213,106,852	1,133,828,658
Taxable interest:							
Number of returns	62,500,172	9,398,553	8,602,386	10,511,262	19,722,637	10,359,139	3,906,193
Amount	192,779,487	12,304,484	14,119,134	16,732,081	41,636,859	33,840,034	74,146,896
Tax-exempt interest [4]:							
Number of returns	6,036,087	448,064	421,142	615,311	1,662,698	1,486,817	1,402,058
Amount	69,505,527	2,292,581	1,871,539	3,309,087	9,636,030	11,576,836	40,819,457
Ordinary dividends:							
Number of returns	31,538,899	4,407,519	3,556,147	4,330,807	9,524,467	6,508,529	3,211,432
Amount	185,974,188	6,341,798	6,689,039	9,222,334	27,672,117	32,611,674	103,437,225
Qualified dividends:							
Number of returns	26,527,893	3,603,463	2,852,224	3,536,339	7,906,716	5,657,809	2,971,341
Amount	130,083,446	3,162,063	3,498,261	5,025,537	16,890,337	21,585,258	79,921,990
State income tax refunds:							
Number of returns	23,117,093	558,024	1,453,674	3,916,292	10,204,589	5,595,597	1,388,919
Amount	22,670,071	523,101	718,430	2,249,332	7,644,525	5,886,385	5,648,298
Alimony received:							
Number of returns	437,222	76,799	113,223	113,749	102,865	22,911	7,677
Amount	7,854,640	469,202	1,009,563	1,489,962	2,383,400	1,117,011	1,385,501
Business or profession net income:							
Number of returns	16,171,389	4,935,087	2,706,877	2,376,501	3,526,978	1,804,635	821,312
Amount	316,776,424	33,961,648	33,215,671	32,464,292	63,147,507	62,402,672	91,584,635
Business or profession net loss:							
Number of returns	5,464,904	1,007,477	809,904	978,345	1,658,693	745,155	265,331
Amount	47,456,970	15,599,583	5,728,321	5,695,514	9,522,642	5,043,176	5,867,735
Net capital gain reported on Schedule D:							
Number of returns	13,234,954	1,478,097	1,240,184	1,623,365	3,787,531	3,052,189	2,053,589
Amount	676,753,504	10,391,627	5,684,784	9,558,503	37,553,097	64,964,904	548,600,585
Capital gain distributions reported on Form 1040:							
Number of returns	4,649,118	775,280	543,387	742,085	1,510,198	847,662	230,507
Amount	8,577,690	847,073	718,607	1,053,251	2,649,260	2,087,711	1,221,785
Net capital loss:							
Number of returns	8,612,023	1,598,634	969,085	1,056,643	2,363,620	1,734,632	889,410
Amount	18,691,022	3,472,291	2,062,755	2,134,173	5,015,656	3,786,854	2,219,293
Sales of property other than capital assets, net gain:							
Number of returns	848,344	90,397	94,484	107,550	228,166	147,590	180,157
Amount	12,220,069	1,048,176	591,014	663,544	1,952,986	2,034,101	5,930,251
Sales of property other than capital assets, net loss:							
Number of returns	828,441	126,553	85,881	96,260	178,999	143,458	197,292
Amount	9,275,159	3,981,291	422,228	467,207	737,206	889,728	2,777,500
Taxable Individual Retirement Arrangement distributions:							
Number of returns	10,064,480	1,423,477	1,842,487	1,771,601	3,115,328	1,440,935	470,649
Amount	125,057,748	6,221,499	11,303,977	14,286,937	39,815,789	33,060,219	20,369,325
Taxable pensions and annuities:							
Number of returns	24,467,625	3,829,440	4,728,589	4,596,298	7,334,198	3,104,743	874,355
Amount	460,647,534	24,269,588	55,138,473	73,632,304	164,388,444	103,222,185	39,996,539

Footnotes at end of table.

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Table 1. Individual Income Tax Returns, Tax Year 2006 Preliminary Data: Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued

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

Item	All returns	Size of adjusted gross income					
		Under \$15,000 [1]	\$15,000 under \$30,000	\$30,000 under \$50,000	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Rent and royalty net income:							
Number of returns	5,607,719	725,924	719,681	757,176	1,594,246	1,060,025	750,673
Amount	77,337,722	4,482,710	3,824,814	4,710,615	13,617,142	14,778,200	35,924,239
Rent and royalty net loss:							
Number of returns	5,203,752	713,691	631,171	841,616	1,719,422	870,231	427,624
Amount	55,133,308	10,210,169	5,531,704	7,275,150	15,405,088	7,820,917	8,890,280
Partnership and S corporation net income:							
Number of returns	4,516,531	288,170	301,191	467,256	1,142,593	1,070,014	1,247,310
Amount	468,113,804	3,455,771	3,430,145	7,255,776	23,042,128	43,998,462	386,931,518
Partnership and S corporation net loss:							
Number of returns	2,305,876	398,433	207,033	283,490	594,637	457,195	365,090
Amount	65,866,290	26,188,819	2,247,787	3,013,156	6,488,869	6,601,529	21,326,132
Estate and trust net income:							
Number of returns	503,385	49,424	36,484	57,386	132,976	124,515	102,600
Amount	17,404,639	259,211	210,515	341,676	1,494,250	2,295,795	12,803,195
Estate and trust net loss:							
Number of returns	33,932	6,485	4,537	1,748	5,971	7,854	7,338
Amount	738,487	265,926	13,161	25,675	22,817	76,801	334,107
Farm net income:							
Number of returns	564,085	109,452	99,286	106,470	153,517	68,575	26,785
Amount	8,395,511	778,825	979,284	1,135,370	2,297,502	1,446,075	1,758,456
Farm net loss:							
Number of returns	1,400,682	267,426	209,619	241,489	424,577	176,888	80,685
Amount	22,519,021	6,113,665	2,386,289	2,880,151	4,995,433	2,791,222	3,352,262
Unemployment compensation:							
Number of returns	7,457,645	1,429,953	2,052,217	1,572,763	1,846,829	477,912	77,973
Amount	26,777,624	4,028,738	7,206,757	5,927,645	7,103,259	2,077,452	433,774
Taxable Social Security benefits:							
Number of returns	13,946,403	75,561	2,511,932	3,601,008	5,139,053	1,892,217	726,631
Amount	146,855,542	290,198	5,006,852	22,940,476	71,339,323	33,219,136	14,059,558
Total statutory adjustments:							
Number of returns	33,832,756	6,547,060	5,278,518	6,005,506	9,425,236	4,861,861	1,714,576
Amount	110,079,073	8,611,968	9,040,544	12,377,704	26,381,764	23,789,113	29,877,980
Educator expenses:							
Number of returns	3,205,761	83,980	212,258	583,505	1,404,912	810,570	110,534
Amount	816,224	18,068	49,667	139,110	362,069	220,294	27,020
Certain business expenses of reservists, performing artists, and fee-basis government officials:							
Number of returns	120,005	15,317	21,367	17,998	38,897	23,251	3,179
Amount	368,850	78,420	54,808	65,275	99,722	58,080	12,543
Payments to an Individual Retirement Arrangement:							
Number of returns	3,286,760	178,443	491,755	778,811	1,129,318	558,773	149,661
Amount	12,768,170	472,522	1,385,278	2,629,202	4,476,408	2,714,408	1,090,352
Student loan interest deduction:							
Number of returns	8,605,148	799,712	1,572,827	2,200,386	3,141,256	890,968	0
Amount	6,187,425	497,263	1,056,644	1,650,012	2,427,939	555,569	0
Tuition and fees deduction:							
Number of returns	4,028,959	786,010	358,634	433,246	1,116,338	1,334,732	0
Amount	9,632,076	2,229,087	832,231	989,390	2,418,219	3,163,148	0
Health savings account deduction:							
Number of returns	351,170	12,193	24,594	52,053	118,650	79,831	63,846
Amount	845,431	25,402	37,404	91,876	255,657	209,772	225,323
Medical savings account deduction:							
Number of returns	17,011	366	1,704	4,466	4,268	3,328	2,881
Amount	29,908	363	1,959	3,888	10,342	4,745	8,613

Footnotes at end of table.

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Table 1. Individual Income Tax Returns, Tax Year 2006 Preliminary Data: Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued

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

Item	All returns	Size of adjusted gross income					
		Under \$15,000 [1]	\$15,000 under \$30,000	\$30,000 under \$50,000	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Moving expenses adjustment:							
Number of returns	1,087,129	97,993	219,402	217,877	331,540	173,608	46,712
Amount	3,157,994	230,899	410,145	471,685	1,009,558	790,413	245,294
Self-employment tax deduction:							
Number of returns	16,892,682	4,847,756	2,751,743	2,437,181	3,673,542	2,004,715	1,177,744
Amount	22,451,883	2,539,574	2,579,976	2,675,869	5,217,133	4,358,707	5,080,625
Self-employed health insurance deduction:							
Number of returns	3,537,194	486,051	519,305	541,133	835,069	593,492	562,143
Amount	18,469,428	1,690,861	1,937,536	2,237,559	4,120,228	3,600,987	4,882,256
Payments to a self-employed retirement (Keogh) plan:							
Number of returns	1,176,905	21,891	35,507	82,013	253,636	385,950	397,911
Amount	20,243,044	114,498	132,705	546,245	2,208,683	5,812,185	11,428,728
Penalty on early withdrawal of savings:							
Number of returns	1,172,267	206,265	202,145	238,170	315,955	159,774	49,957
Amount	433,716	81,515	70,368	69,700	117,092	57,481	37,563
Alimony paid:							
Number of returns	578,779	37,739	51,145	87,032	200,109	118,940	83,817
Amount	8,701,183	455,843	406,037	687,352	1,814,032	1,813,597	3,524,321
Domestic production activities deduction:							
Number of returns	402,710	8,396	14,348	35,238	85,632	95,022	164,075
Amount	3,277,003	1,863	6,736	24,893	89,566	183,254	2,970,693
Other adjustments:							
Number of returns	136,308	13,915	23,691	26,592	36,289	24,872	10,952
Amount	1,066,677	154,352	72,159	82,416	235,184	232,571	289,992
Total deductions:							
Number of returns	135,806,268	35,010,184	29,646,832	24,902,939	30,050,155	12,108,440	4,087,716
Amount	1,793,667,050	219,938,507	244,698,207	259,106,584	469,953,668	311,346,592	288,623,494
Total standard deduction:							
Number of returns	86,788,384	33,132,063	25,035,792	16,008,030	10,954,420	1,442,339	215,740
Amount	611,274,926	192,576,599	177,811,464	123,100,918	101,049,207	14,618,909	2,117,831
Basic standard deduction:							
Number of returns	86,788,384	33,132,063	25,035,792	16,008,030	10,954,420	1,442,339	215,740
Amount	594,041,953	187,246,043	173,020,725	120,131,694	97,813,107	13,841,621	1,988,758
Additional standard deduction:							
Number of returns	11,419,381	3,735,598	3,137,026	1,952,605	2,046,588	468,724	78,839
Amount	17,232,969	5,330,553	4,790,733	2,969,222	3,236,100	777,288	129,072
Total itemized deductions (after limitation):							
Number of returns	49,017,884	1,878,122	4,611,040	8,894,908	19,095,734	10,666,100	3,871,976
Amount	1,182,392,125	27,361,908	66,886,742	136,005,666	368,904,461	296,727,683	286,505,663
Itemized deductions in excess of limitation:							
Number of returns	6,827,652	0	0	0	102,259	2,854,004	3,871,390
Amount	33,562,088	0	0	0	23,548	1,275,777	32,262,764
Medical and dental expenses deduction:							
Number of returns	10,121,720	1,198,624	2,094,087	2,566,113	3,358,984	814,888	89,025
Amount	69,090,147	8,605,357	14,073,218	14,859,988	21,344,251	7,580,273	2,627,055
Taxes paid deduction:							
Number of returns	48,565,862	1,786,455	4,470,749	8,761,972	19,025,427	10,653,668	3,867,589
Amount	423,257,838	4,810,268	12,682,925	32,111,521	110,636,971	111,275,862	151,740,293
State and local income taxes [5]:							
Number of returns	46,847,080	1,573,754	4,126,506	8,351,937	18,491,140	10,470,750	3,832,993
Amount	258,058,659	1,133,894	4,100,589	13,956,090	57,314,601	64,276,889	117,276,598
Income taxes:							
Number of returns	35,846,674	587,785	2,377,349	6,153,913	14,821,496	8,711,236	3,194,895
Amount	239,126,293	589,572	2,750,263	11,430,636	51,151,106	59,692,890	113,511,827
General sales taxes:							
Number of returns	11,000,405	985,968	1,749,157	2,198,024	3,669,644	1,759,514	638,100
Amount	18,932,366	544,322	1,350,325	2,525,455	6,163,495	4,583,999	3,764,769

Footnotes at end of table.

Individual Income Tax Returns, Preliminary Data, 2006

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Table 1. Individual Income Tax Returns, Tax Year 2006 Preliminary Data: Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued

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

Item	All returns	Size of adjusted gross income					
		Under \$15,000 [1]	\$15,000 under \$30,000	\$30,000 under \$50,000	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Interest paid deduction:							
Number of returns	40,110,187	1,206,964	3,105,372	6,888,558	16,367,162	9,332,120	3,210,013
Amount	450,398,602	10,574,132	25,965,861	58,215,543	160,618,658	120,314,309	74,710,104
Charitable contributions deduction:							
Number of returns	41,427,765	1,179,148	3,262,742	6,926,596	16,486,384	9,891,158	3,681,738
Amount	173,018,464	1,619,116	6,190,357	14,706,167	44,069,662	38,178,579	68,254,587
Taxable income:							
Number of returns	106,803,674	11,344,628	25,074,747	24,330,098	29,883,128	12,089,990	4,081,084
Amount	5,553,096,928	34,742,527	250,711,104	551,385,341	1,409,304,270	1,187,091,681	2,119,862,003
Alternative minimum tax:							
Number of returns	4,037,074	10,023	6,117	10,697	219,535	1,132,178	2,658,522
Amount	19,252,710	81,650	19,488	27,197	272,525	2,141,751	16,710,101
Income tax before credits:							
Number of returns	106,823,754	11,353,195	25,074,981	24,330,101	29,888,144	12,093,831	4,083,501
Amount	1,083,780,725	3,534,141	28,876,222	71,230,518	207,895,254	217,060,887	555,183,703
Total tax credits [6]:							
Number of returns	46,331,299	2,612,210	11,035,421	10,634,048	14,362,114	5,765,181	1,922,326
Amount	57,450,072	392,661	6,314,560	11,384,119	22,875,797	6,523,387	9,959,547
Child care credit:							
Number of returns	6,524,616	32,606	1,158,838	1,363,553	2,416,598	1,274,787	278,235
Amount	3,519,410	4,614	600,325	803,006	1,282,657	686,508	142,298
Credit for the elderly or disabled:							
Number of returns	99,044	56,056	42,987	0	0	0	0
Amount	14,847	10,406	4,441	0	0	0	0
Child tax credit:							
Number of returns	25,818,992	231,421	5,532,472	6,782,577	10,165,509	3,105,352	1,662
Amount	31,836,114	26,241	2,935,137	7,688,856	16,876,668	4,307,676	1,539
Education tax credits:							
Number of returns	7,819,470	591,175	2,097,080	2,099,279	2,880,739	151,196	0
Amount	7,128,447	183,375	1,590,445	1,995,076	3,287,047	72,505	0
Retirement savings contributions credit:							
Number of returns	5,261,485	302,371	2,455,945	2,502,518	651	0	0
Amount	908,521	65,226	450,252	392,997	46	0	0
Adoption credit:							
Number of returns	90,684	**	** 3,823	22,130	47,532	16,298	901
Amount	334,705	**	** 2,444	29,250	164,824	132,007	6,175
Residential energy credits:							
Number of returns	4,452,576	36,272	290,575	788,993	1,971,839	1,082,415	282,480
Amount	1,023,719	4,035	57,309	164,205	439,585	272,507	86,078
Foreign tax credit:							
Number of returns	6,392,372	330,261	419,423	663,904	1,804,546	1,704,651	1,469,584
Amount	9,430,601	10,500	42,768	81,359	414,109	674,590	8,207,274
General business credit:							
Number of returns	362,918	6,144	11,829	40,711	130,406	106,583	67,247
Amount	1,114,077	1,074	9,440	64,217	263,407	170,008	605,930
Prior year minimum tax credit:							
Number of returns	334,017	1,463	10,253	12,102	55,565	148,009	106,627
Amount	1,012,865	114	6,047	17,123	56,906	159,657	773,019
Self-employment tax:							
Number of returns	16,892,682	4,847,756	2,751,743	2,437,181	3,673,542	2,004,715	1,177,744
Amount	44,895,363	5,076,735	5,158,588	5,350,527	10,432,451	8,716,400	10,160,659
Total earned income credit (EIC):							
Number of returns	23,392,886	12,396,250	8,963,542	2,033,092	0	0	0
Amount	45,364,048	22,920,782	21,107,675	1,335,592	0	0	0
EIC used to offset income tax before credits:							
Number of returns	2,983,077	1,086,868	1,358,391	537,820	0	0	0
Amount	808,517	86,583	605,753	116,179	0	0	0

Footnotes at end of table.

Individual Income Tax Returns, Preliminary Data, 2006

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Table 1. Individual Income Tax Returns, Tax Year 2006 Preliminary Data: Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued

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

Item	All returns	Size of adjusted gross income					
		Under \$15,000 [1]	\$15,000 under \$30,000	\$30,000 under \$50,000	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
EIC used to offset other taxes:							
Number of returns	4,972,285	3,247,574	1,400,473	324,238	0	0	0
Amount	4,645,878	2,724,744	1,750,799	170,336	0	0	0
Excess EIC, refundable portion:							
Number of returns	20,639,026	10,804,666	8,346,920	1,487,439	0	0	0
Amount	39,909,653	20,109,454	18,751,122	1,049,077	0	0	0
Additional child tax credit:							
Number of returns	15,723,997	2,753,186	8,286,213	3,674,218	989,158	21,224	0
Amount	16,354,979	1,266,585	8,671,525	5,075,484	1,307,461	33,924	0
Credit for Federal telephone excise tax paid:							
Number of returns	97,260,127	18,193,693	20,015,816	18,932,562	25,344,153	10,956,847	3,817,058
Amount	4,180,071	723,444	824,876	783,685	1,134,889	524,961	188,219
Total income tax:							
Number of returns	92,762,414	9,902,429	17,305,918	20,519,800	28,883,062	12,071,006	4,080,197
Amount	1,026,331,685	3,141,480	22,561,661	59,846,400	185,019,469	210,537,500	545,225,176
Total tax liability:							
Number of returns	96,671,006	12,396,501	18,035,187	21,004,343	29,074,807	12,078,369	4,081,801
Amount	1,071,236,902	5,670,230	25,846,422	65,043,172	196,955,952	220,670,589	557,050,537

** Data combined to prevent disclosure of specific taxpayer information.

[1] Includes returns with adjusted gross deficit.

[2] For 2006, the total number of Form 1040EZ returns includes 739,206 Form 1040EZ-T returns.

[3] Included in data for Forms 1040, 1040A, and 1040EZ.

[4] Not included in adjusted gross income.

[5] State and local income taxes are the total of both income taxes and general sales taxes.

[6] Includes EIC used to offset income tax before credits, shown separately later in this table.

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

High-Income Tax Returns for 2005

by Brian Balkovic

The Tax Reform Act of 1976 requires annual publication of data on individual income tax returns reporting income of \$200,000 or more, including the number of such returns reporting no income tax liability and the importance of various tax provisions in making these returns nontaxable.¹ This article presents detailed data for the 3.6 million high-income returns for 2005, as well as summary data for the period 1977 to 2004. Detailed data for the years 1974 through 2004 have been published previously (see Reference Section for more details).

Two income concepts are used in this article to classify tax returns as high-income: the statutory concept of adjusted gross income (AGI) and the expanded income concept.² Expanded income uses items reported on tax returns to obtain a more comprehensive measure of income than AGI. Specifically, expanded income is AGI *plus* tax-exempt interest, nontaxable Social Security benefits, the foreign-earned income exclusion, and items of “tax preference” for “alternative minimum tax” purposes; *less* unreimbursed employee business expenses, moving expenses, investment interest expense to the extent it does not exceed investment income, and miscellaneous itemized deductions not subject to the 2-percent-of-AGI floor.^{3, 4, 5} Note that, although expanded income is a more comprehensive measure of income than AGI, for some taxpayers, the subtractions from AGI to arrive at expanded income exceed the additions, with the result that expanded income is less than AGI.

Number of High-Income Returns

Figure A and Table 1 show that, for 2005, there were 3,566,125 individual income tax returns reporting AGI of \$200,000 or more, and 3,584,012 returns

with expanded income of \$200,000 or more. These returns represented 2.654 percent and 2.667 percent, respectively, of all returns for 2005.

From 1977 to 2000, the numbers of returns reporting incomes of \$200,000 or more increased each year, and, each year, those high-income returns were a larger share of all tax returns. However, for 2001 and 2002, both the number of high-income returns and their percentage of all returns decreased. For 2003, both the numbers of high-income returns and their share of all returns increased, but by all measures were still lower than in 2001. With a slightly larger increase than 2003, the number of returns and their percentage of all returns for 2004 rose above the previous high set in 2000. This trend continued in 2005 by having the single largest year-to-year increase in both number of returns and percentage of all returns since at least 1978.

The difference in the number of high-income returns between the two income concepts significantly decreased beginning with 1987, when AGI began to include 100 percent of long-term capital gains. That change in the definition of AGI made AGI and expanded income concepts more comparable. In addition, as a result of the inclusion of tax-exempt interest in expanded income starting with 1987, expanded income for years after 1986 is not strictly comparable to expanded income for years before 1987.

In the top panel of Figure A, the \$200,000 threshold for high-income returns is measured in current-year (nominal) dollars. As a result of inflation, the real (constant) dollar level of the threshold has fallen over time, and some returns are classified as high-income that would not have been classified as high-income for earlier years. To maintain the comparability of the real threshold over time, the nominal \$200,000 threshold has been adjusted for inflation to 1976 constant dollars for all years, and the number of high-income tax returns has been recomputed in the lower panel of Figure A.⁶

Brian Balkovic is an economist with the Individual Returns Analysis Section. This article was prepared under the direction of Jeff Hartzok, Chief.

¹ The statutory requirement is contained in section 2123 of the Tax Reform Act of 1976 (90 Stat. at 1915).

² The 1976 Act specified four income concepts for classifying tax returns: adjusted gross income (AGI), expanded income, AGI plus excluded tax preference items, and AGI less investment interest expense not in excess of investment income. Section 441 of the Deficit Reduction Act of 1984 (98 Stat. at 815) eliminated the requirement to use the last two income concepts.

³ The definition of adjustments to AGI to obtain the expanded income given in the text is for the current year. See Appendix A for a discussion of AGI and expanded income and a list of adjustments covering all years since 1977.

⁴ See Notes to Appendix A, A4.

⁵ Tax-exempt interest had to be reported on the individual income tax return starting with Tax Year

1987 and is included in expanded income starting with that year. Beginning with Tax Year 1991, tax-exempt interest was incorporated into the criteria used for sampling returns for Statistics of Income, thus increasing the reliability of the estimates of expanded income.

⁶ Inflation-adjusted constant dollars are based on the Consumer Price Index (CPI-U) computed and reported by the U.S. Department of Labor, Bureau of Labor Statistics, Monthly Labor Review. The consumer price index approximates buying patterns of typical urban consumers. The annual index is the average of the monthly indices.

High-Income Tax Returns for 2005

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Figure A

All Returns and Returns with Income of \$200,000 or More Measured in Current Dollars and in 1976 Constant Dollars, by Income Concept, Tax Years 1977-2005

Tax year	All returns	\$200,000 income threshold measured in current dollars			
		Number of returns by income concept		Percentage of all returns by income concept	
		Adjusted gross income	Expanded income	Adjusted gross income	Expanded income
	(1)	(2)	(3)	(4)	(5)
1977	86,634,640	53,403	67,580	0.062	0.078
1978	89,771,551	68,506	85,137	0.076	0.095
1979	92,694,302	93,731	122,231	0.101	0.132
1980	93,902,459	117,250	149,826	0.125	0.160
1981	95,396,123	138,136	175,092	0.145	0.184
1982	95,337,432	169,367	207,291	0.178	0.217
1983	96,321,310	198,608	249,319	0.206	0.259
1984	99,438,708	243,760	310,042	0.245	0.312
1985	101,660,287	296,507	370,340	0.292	0.364
1986	103,045,170	374,363	529,460	0.363	0.514
1987	106,996,270	539,967	557,848	0.505	0.521
1988	109,708,280	725,345	737,659	0.661	0.672
1989	112,135,673	786,063	814,152	0.701	0.726
1990	113,717,138	834,957	860,940	0.734	0.757
1991	114,730,123	846,707	892,178	0.738	0.778
1992	113,604,503	954,747	989,522	0.840	0.871
1993	114,601,819	993,326	1,043,213	0.867	0.910
1994	115,943,131	1,109,498	1,153,829	0.957	0.995
1995	118,218,327	1,272,508	1,319,382	1.076	1.116
1996	120,351,208	1,523,407	1,572,114	1.266	1.306
1997	122,421,991	1,807,900	1,854,031	1.477	1.514
1998	124,770,662	2,085,211	2,132,301	1.671	1.709
1999	127,075,145	2,429,942	2,479,556	1.912	1.951
2000	129,373,500	2,771,577	2,807,804	2.142	2.170
2001	130,255,237	2,567,220	2,605,021	1.971	2.000
2002	130,076,443	2,414,128	2,464,515	1.856	1.895
2003	130,423,626	2,536,439	2,573,133	1.945	1.973
2004	132,226,042	3,021,435	3,067,602	2.285	2.320
2005	134,372,678	3,566,125	3,584,012	2.654	2.667

Tax year	Current dollar income threshold equal to \$200,000 in 1976 constant dollars (whole dollars)	\$200,000 income threshold measured in 1976 constant dollars [1]			
		Number of returns by income concept		Percentage of all returns by income concept	
		Adjusted gross income	Expanded income	Adjusted gross income	Expanded income
	(6)	(7)	(8)	(9)	(10)
1977	213,005	45,931	58,991	0.053	0.068
1978	229,174	49,388	62,556	0.055	0.070
1979	255,184	55,542	76,479	0.060	0.083
1980	289,631	52,512	71,704	0.056	0.076
1981	319,508	50,880	71,146	0.053	0.075
1982	339,192	59,411	81,297	0.062	0.085
1983	350,088	67,310	93,977	0.070	0.098
1984	365,202	80,800	116,389	0.081	0.117
1985	378,207	95,740	134,715	0.094	0.133
1986	385,237	119,550	191,596	0.116	0.186
1987	399,297	161,408	169,942	0.151	0.159
1988	415,817	235,051	241,201	0.214	0.220
1989	435,852	217,685	228,530	0.194	0.204
1990	459,400	216,716	228,659	0.191	0.201
1991	478,735	183,442	195,743	0.160	0.171
1992	493,146	213,783	227,354	0.188	0.200
1993	507,909	201,236	212,853	0.176	0.186
1994	520,914	204,532	214,673	0.176	0.185
1995	535,677	237,770	248,077	0.201	0.210
1996	551,494	278,342	288,194	0.231	0.239
1997	564,148	335,040	345,869	0.274	0.283
1998	572,934	385,183	396,207	0.309	0.318
1999	585,589	436,118	446,583	0.343	0.351
2000	605,272	482,396	492,589	0.373	0.381
2001	622,495	391,901	400,906	0.301	0.308
2002	632,337	345,892	356,402	0.266	0.274
2003	646,749	356,727	367,012	0.274	0.281
2004	663,972	436,583	445,934	0.330	0.337
2005	686,467	519,216	527,126	0.386	0.392

[1] 1976 constant dollars were calculated using the U.S. Bureau of Labor Statistics' consumer price index for urban consumers. See footnote 6 of this article for further details.

High-Income Tax Returns for 2005

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When measured in 1976 constant dollars, under the expanded income concept, the total number of high-income returns for 2005 was only 8.9 times the number for 1977, whereas the number of high-income returns for 2005 measured in current-year dollars was 53.0 times as large as for 1977. For 2005, the share of high-expanded income returns in constant dollars was 0.392 percent, an increase from 0.337 percent in 2004, and above the previous peak of 0.381 percent in 2000. Figure B shows the difference between the constant and current dollar shares of high expanded-income returns.

Based on AGI, the number of high-income returns for 2005 measured in current-year dollars was 66.8 times as large as for 1977, whereas, measured

in 1976 constant dollars the number of returns for 2005 was only 11.3 times the number for 1977. For Tax Year 2005, the share of high AGI income returns in constant dollars, increased to 0.386 percent from 0.330 percent in 2004.

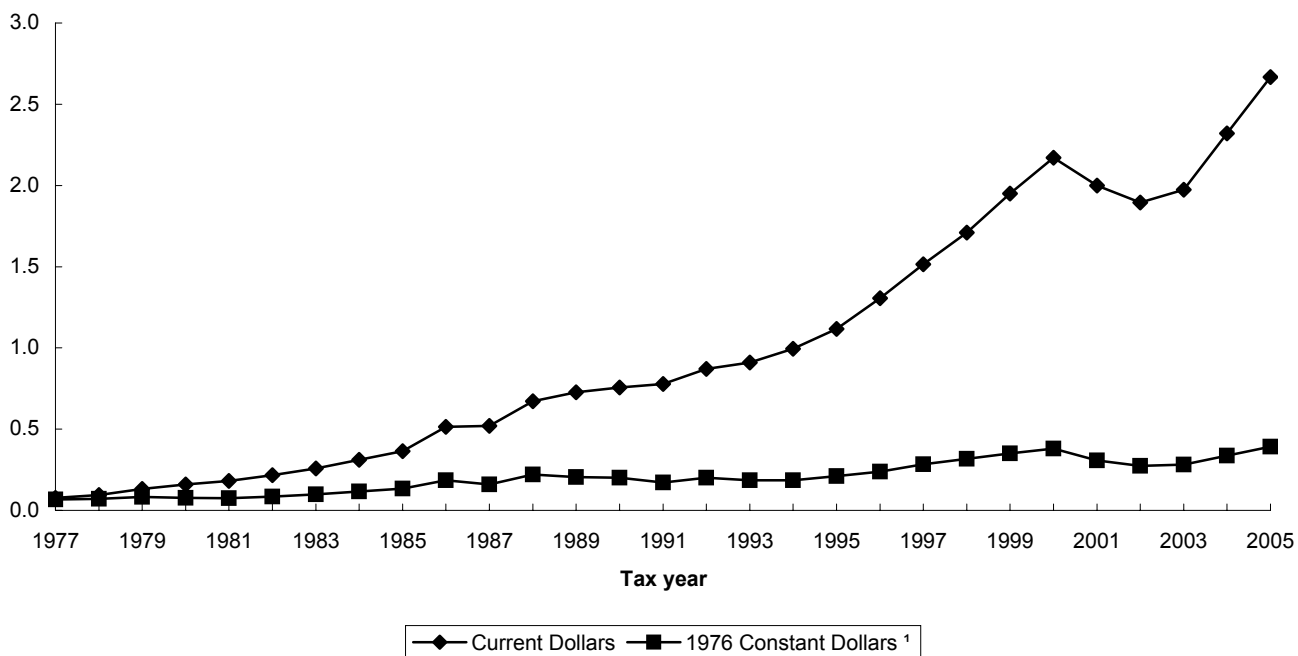
Nontaxable High-Income Returns

Two tax concepts are used in this article to classify tax returns as taxable or nontaxable. The first concept, "U.S. income tax," is total Federal income tax liability (including the "alternative minimum tax" (AMT)), less all credits against income tax. Since the U.S. income tax applies to worldwide income and since a credit (subject to certain limits) is allowed against U.S. income tax for income taxes paid

Figure B

Returns with Expanded Income of \$200,000 or More: Percentage of All Returns Measured in Current and 1976 Constant Dollars, Tax Years 1977-2005

Percentage of returns



¹ 1976 constant dollars were calculated using the U.S. Bureau of Labor Statistics' consumer price index for urban consumers. See footnote 6 of this article for further details.

to foreign governments, a return could be classified as nontaxable under this first concept even though income taxes had been paid to a foreign government. The second tax concept, “worldwide income tax,” addresses this circumstance by adding to U.S. income tax the allowed foreign tax credit and foreign taxes paid on excluded foreign-earned income.^{7 8}

For 2005, of the 3,566,125 tax returns with AGI of \$200,000 or more, 7,389 (0.207 percent) had no U.S. income tax liability; and 4,224 (0.118 percent) had no worldwide income tax liability (the top panel of Figure C). For 2004, of the 3,021,435 returns with AGI of \$200,000 and over, 2,833 (0.094 percent) had no U.S. income tax liability, and 2,420 (0.080 percent) had no worldwide income tax liability.

For 2005, of the 3,584,012 tax returns with expanded income of \$200,000 or more, 10,680 (0.298 percent) had no U.S. income tax liability; and 5,420 (0.151 percent) had no worldwide income tax liability. For 2004, of the 3,067,602 returns with expanded income of \$200,000 or more, 5,028 (0.164 percent) had no U.S. income tax liability; and 4,101 (0.134 percent) had no worldwide income tax liability.

Whether measured by the absence of U.S. income tax or worldwide income tax, AGI, or expanded income, the numbers of nontaxable high-income returns increased significantly between 2004 and 2005. The increases, however, in both the numbers of returns and the percentages of nontaxable returns were dramatically larger when measured by U.S. income tax than when measured by worldwide income tax.

The major reason for the very large increases when measured by U.S. income tax was a 2004 statutory change that allowed individual taxpayers, beginning in Tax Year 2005, to use alternative minimum tax foreign tax credit to reduce up to 100 percent of precredit alternative minimum tax. Prior to Tax Year 2005, the foreign tax credit could reduce precredit AMT liability by only 90 percent. Tax law changes related to Hurricane Katrina also led to increases in the numbers of nontaxable high income returns, whether measured by U.S. or worldwide income tax liability. That legislation permitted cash charitable

contributions made after August 27, 2005, and before January 1, 2006, not to be subject to either the overall limit on itemized deductions or the 50-percent-of-AGI limit for charitable contributions.

Regardless of the income measure (AGI or expanded income) or the tax concept (U.S. income tax or worldwide income tax) used, the numbers of 2005 nontaxable, high-income returns in 1976 constant dollars were much lower than the numbers in current dollars. The percentages of nontaxable returns, however, are not substantially different regardless of whether measured in constant or current dollars. Of returns with AGI of \$200,000 or more in current dollars, 0.207 percent had no U.S. income tax for 2005; and 0.118 percent had no worldwide income tax. For returns in 1976 constant dollars, the percentage without U.S. income tax liability was 0.225; the percentage without worldwide income tax liability was 0.120 (see the lower panel of Figure C).

Of returns with expanded income of \$200,000 or more in current dollars, 0.298 percent had no U.S. income tax for 2005; and 0.151 percent had no worldwide income tax. When looking at these returns using 1976 constant dollars, the percentage without U.S. income tax liability was 0.234; the percentage without worldwide income tax liability was 0.118.

Figure D shows the number of returns with no worldwide income tax and with expanded income of \$200,000 or more and their proportion of all high-expanded income returns for 1977 through 2005. These data are shown in both current-year and 1976 constant dollars. In this figure, the spread between the two percentage lines was small for the late 1970s, showed an increase for the early 1980s, and then narrowed before widening again after 1988. The spread generally narrowed after 1993 but has increased or stayed fairly consistent since 2002.

Note that, because the number of nontaxable returns with expanded income of \$200,000 or more is based on samples, year-to-year differences in the numbers and percentages of nontaxable returns with expanded income of \$200,000 or more may represent sampling variability, in addition to actual changes

⁷ See Appendix B for a discussion of the tax concepts. In data published for years prior to 1989, either in articles presented in the *Statistics of Income Bulletin* or in chapters in *Statistics of Income-Individual Income Tax Returns* (see Reference Section), the “U.S. income tax” concept was described as “total income tax,” and the “worldwide income tax” concept was described as “modified total income tax.”

⁸ The inclusion of foreign taxes paid on excluded foreign-earned income, beginning with Tax Year 1990, represents an improvement in the worldwide income tax concept. It does, however, represent a slight break in the year-to-year comparability of data for worldwide income tax. However, the number of returns with foreign taxes paid on excluded foreign-earned income is extremely small compared to the number of returns with the foreign tax credit.

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Figure C

Nontaxable Returns with Income of \$200,000 or More Measured in Current Dollars and in 1976 Constant Dollars, by Tax and Income Concept, Tax Years 1977-2005

Tax year	\$200,000 income threshold measured in current dollars							
	Number of nontaxable returns with income of \$200,000 or more				Percentage of all returns with income of \$200,000 or more			
	Returns with no U.S. income tax, by income concept		Returns with no worldwide income tax, by income concept		Returns with no U.S. income tax, by income concept		Returns with no worldwide income tax, by income concept	
	Adjusted gross income	Expanded income	Adjusted gross income	Expanded income	Adjusted gross income	Expanded income	Adjusted gross income	Expanded income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1977	60	85	37	64	0.112	0.126	0.069	0.095
1978	98	105	60	67	0.143	0.123	0.088	0.079
1979	70	114	28	64	0.075	0.093	0.030	0.052
1980	143	198	56	114	0.122	0.132	0.048	0.076
1981	226	304	79	114	0.164	0.174	0.057	0.065
1982	262	299	109	153	0.155	0.144	0.064	0.074
1983	447	579	321	437	0.225	0.232	0.162	0.175
1984	532	325	471	271	0.218	0.105	0.193	0.087
1985	612	613	442	454	0.206	0.166	0.149	0.123
1986	659	595	437	379	0.176	0.112	0.117	0.072
1987	857	472	740	364	0.159	0.085	0.137	0.065
1988	822	397	731	309	0.113	0.054	0.101	0.042
1989	1,081	779	987	691	0.138	0.096	0.126	0.085
1990	1,219	1,183	1,114	1,087	0.146	0.137	0.133	0.126
1991	1,253	1,933	1,131	1,740	0.148	0.217	0.134	0.195
1992	909	1,896	823	1,799	0.095	0.192	0.086	0.182
1993	1,022	2,392	932	1,950	0.103	0.229	0.094	0.187
1994	1,137	2,574	1,061	2,161	0.102	0.223	0.096	0.187
1995	998	2,676	896	1,746	0.078	0.203	0.070	0.132
1996	1,044	1,820	950	1,660	0.069	0.116	0.062	0.106
1997	1,189	1,814	1,048	1,562	0.066	0.098	0.058	0.084
1998	1,467	2,224	1,283	1,914	0.070	0.104	0.062	0.090
1999	1,605	2,525	1,398	2,174	0.066	0.102	0.058	0.088
2000	2,328	2,766	2,022	2,320	0.084	0.099	0.073	0.083
2001	3,385	4,910	2,875	4,119	0.132	0.188	0.112	0.158
2002	2,959	5,650	2,551	4,922	0.123	0.229	0.106	0.200
2003	2,824	5,839	2,416	4,934	0.111	0.227	0.095	0.192
2004	2,833	5,028	2,420	4,101	0.094	0.164	0.080	0.134
2005	7,389	10,680	4,224	5,420	0.207	0.298	0.118	0.151

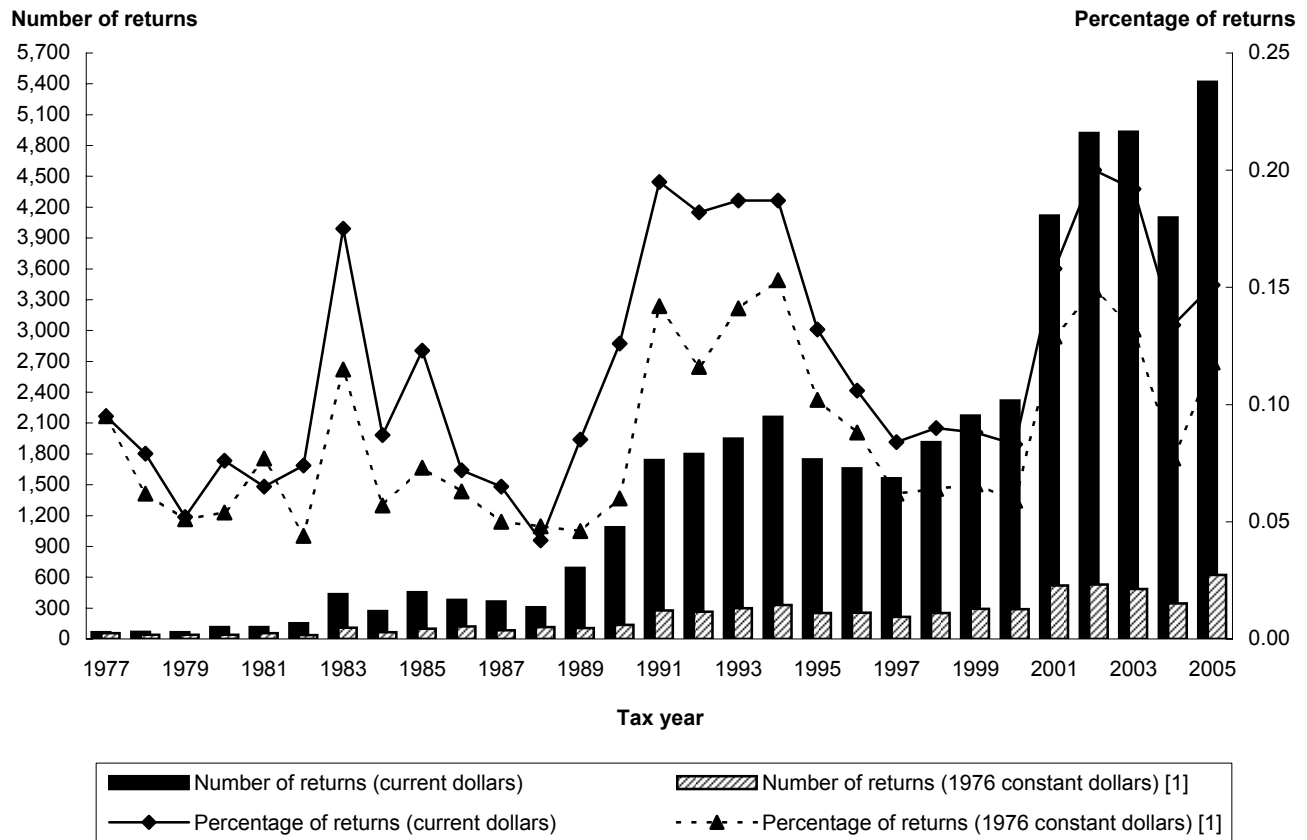
Tax year	\$200,000 income threshold measured in 1976 constant dollars [1]							
	Number of nontaxable returns with income of \$200,000 or more				Percentage of all returns with income of \$200,000 or more			
	Returns with no U.S. income tax, by income concept		Returns with no worldwide income tax, by income concept		Returns with no U.S. income tax, by income concept		Returns with no worldwide income tax, by income concept	
	Adjusted gross income	Expanded income	Adjusted gross income	Expanded income	Adjusted gross income	Expanded income	Adjusted gross income	Expanded income
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
1977	54	75	32	56	0.118	0.127	0.070	0.095
1978	62	70	31	39	0.126	0.112	0.063	0.062
1979	38	71	15	39	0.068	0.093	0.027	0.051
1980	56	71	22	39	0.107	0.099	0.042	0.054
1981	53	87	21	55	0.104	0.122	0.041	0.077
1982	58	68	27	36	0.098	0.084	0.045	0.044
1983	138	135	113	108	0.205	0.144	0.168	0.115
1984	170	78	160	66	0.210	0.067	0.198	0.057
1985	190	155	137	99	0.198	0.115	0.143	0.073
1986	201	189	138	120	0.168	0.099	0.115	0.063
1987	312	126	271	85	0.193	0.074	0.168	0.050
1988	277	141	251	116	0.118	0.058	0.107	0.048
1989	293	128	269	106	0.135	0.056	0.124	0.046
1990	339	169	307	137	0.156	0.074	0.142	0.060
1991	301	305	273	277	0.164	0.156	0.149	0.142
1992	171	288	148	264	0.080	0.127	0.069	0.116
1993	180	323	160	300	0.089	0.152	0.080	0.141
1994	227	345	209	329	0.111	0.161	0.102	0.153
1995	202	281	174	252	0.085	0.113	0.073	0.102
1996	236	275	213	254	0.085	0.095	0.077	0.088
1997	256	247	222	214	0.076	0.071	0.066	0.062
1998	290	289	251	253	0.075	0.073	0.065	0.064
1999	351	343	296	293	0.080	0.077	0.068	0.066
2000	464	365	390	290	0.096	0.074	0.081	0.059
2001	694	648	567	519	0.177	0.162	0.145	0.129
2002	520	616	437	530	0.150	0.173	0.126	0.149
2003	407	567	339	485	0.114	0.154	0.095	0.132
2004	350	396	301	344	0.080	0.089	0.069	0.077
2005	1,166	1,236	625	624	0.225	0.234	0.120	0.118

[1] 1976 constant dollars were calculated using the U.S. Bureau of Labor Statistics' consumer price index for urban consumers. See footnote 6 of this article for further details.

NOTE: See Figure H for the derivation of U.S. income tax and worldwide income tax.

Figure D

Number and Percentage of Returns with No Worldwide Income Tax and with Expanded Income of \$200,000 or More Measured in Current Dollars and in 1976 Constant Dollars, Tax Years 1977-2005



[1] 1976 constant dollars were calculated using the U.S. Bureau of Labor Statistics' consumer price index for urban consumers. See footnote 6 of this article for further details.

NOTE: See Figure H for the derivation of worldwide income tax.

in the numbers of such returns. Beginning with Tax Year 1991, nontaxable returns with expanded income of \$200,000 or more were sampled at higher rates for Statistics of Income, which reduced the sampling variability of these returns and therefore provided improved estimates. Thus, the data for returns prior to 1991 are not entirely comparable with data for more recent years.

Detailed Data for 2005

Tables 1 through 12 present data based on income tax returns for 2005, mainly those with income of \$200,000 or more (measured in current-year dollars) of AGI or expanded income. Most of the data are

shown for taxable and nontaxable returns, both separately and combined. In summary, the tables show:

- The numbers of returns under the two tax concepts, cross-classified by broad AGI and expanded income-size classes (Tables 1 and 2 for 2005 current dollar income classes and Table 1 and 2 for 1976 constant dollar income classes);
- The distributions of taxable income as a percentage of AGI and expanded income (Tables 3 and 4);
- The frequencies and amounts of various sources of income, exclusions, deductions, taxes, and tax credits, as well as the relationship between the two income concepts (Tables 5 and 6);

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- The frequencies with which various deductions and tax credits are the most important and second most important items in reducing (or eliminating) income tax (Tables 7 and 8);
- The frequencies with which various itemized deductions, tax credits, and tax preference items occur as certain percentages of income (Tables 9 and 10); and
- The distributions of effective tax rates, i.e., income tax under each definition as a percentage of income, by broad income-size classes (Tables 11 and 12).

Tables 1, 3, 5, 7, 9, and 11 use the U.S. income tax concept to classify returns as taxable or nontaxable, whereas Tables 2, 4, 6, 8, 10, and 12 use the worldwide income tax concept.

Size of Income

Tables 1 and 2 show the number of all returns, taxable returns, and nontaxable returns, cross-classified by broad AGI and expanded income-size classes. The tables show that most returns fall in the same broad income-size class under both income concepts, but that the number of nontaxable returns is greater in each income class over \$50,000 when income is measured by economic income rather than by AGI. Table 1 shows that 7,389 returns with no U.S. income tax had an AGI of \$200,000 or more; and 10,680 returns with no U.S. income tax had an expanded income of \$200,000 or more.

Distribution of Tax Levels

Tables 3 and 4 show the distributions of high-income returns by the ratios of "adjusted" taxable income to AGI or expanded income. Taxable income has been adjusted for these tables by subtracting from taxable income the deduction equivalents of tax credits and other items.⁹ Thus, the tables show the extent to which AGI or expanded income, respectively, are reduced before taxes are imposed on the remaining income. The tables also illustrate three important facts about high-income tax returns. (The examples in the paragraphs below are drawn from the "expanded income" columns in Table 4.)

- As already described, only a small portion of high-income taxpayers were able to escape all income taxes (0.2 percent).
- Another group of high-income taxpayers—small, but larger than the nontaxable group—was able to offset a very substantial fraction of its income before being subject to tax. This type of high-income taxpayer pays income tax equal to only a small share of his or her income. Such taxpayers may be called "nearly nontaxables." (Around 0.8 percent of high expanded-income taxpayers who reported at least some worldwide tax liability were able to reduce their taxable incomes to less than 25 percent of their expanded incomes.)
- Overall, a large portion of high-income taxpayers were subject to tax on a large share of their incomes and, consequently, reported very substantial amounts of tax. (62.2 percent of high-expanded income taxpayers had taxable income equal to 80 percent or more of expanded income; and 94.5 percent had taxable income equal to 50 percent or more of expanded income.)

Tables 11 and 12 show the distributions of tax returns in another way: by tax burden. These two tables classify all tax returns by both size of income and effective tax rate, i.e., income tax as a percentage of either adjusted gross income or expanded income. These tables show that, on average, high-income taxpayers did have higher effective tax rates. The tables also illustrate the wide dispersion of effective tax rates for high-income returns. For example, Table 12 shows that, while 2.4 percent of returns with adjusted gross income of \$200,000 or more had either no worldwide income tax or worldwide income tax of less than 10 percent of expanded income, 23.6 percent had effective tax rates of 25 percent or more. In addition, 33.3 percent had effective tax rates between 20 percent and 25 percent.

Characteristics of Tax Returns

Tables 5 and 6 show, in the aggregate, the frequencies and amounts of the types of income, the items of tax preference, and the various deductions, credits, and income taxes shown on high-income returns.

⁹ See Appendix B for a description of how the deduction equivalent of credits was computed.

By comparing the columns for nontaxable returns with those for taxable returns, some of the different characteristics of nontaxable returns can be deduced. For example, nontaxable returns under the expanded-income concept were much more likely to have tax-exempt interest than were taxable returns, and, when they did have it, the average amount was much higher. Similarly, nontaxable returns were much less likely to have any income from salaries and wages.

The impact of the previously mentioned legislative change to allow individual taxpayers to reduce their precredit minimum tax by up to 100 percent of their alternative minimum tax foreign tax credit can also be seen in Table 5 when compared to the 2004 data published in the spring 2007 edition of the *SOI Bulletin*. For returns under the adjusted gross income-concept with incomes of \$200,000 or more and no U.S. income tax, there were 3,164 returns showing a total of \$447.3 million in foreign tax credit claimed for 2005. This compares to only 412 returns showing a total of \$16.6 million in foreign tax credit claimed for 2004. Charitable contributions reported on nontaxable returns also increased significantly due to the legislative change made as a result of Hurricane Katrina. A total of 4,925 returns showed \$1,334.8 million for the charitable contributions deduction for 2005 compared to 2,160 returns showing a total of \$148.6 million for the charitable contributions deduction for 2004.

Reasons for Nontaxability

It is possible for certain itemized deductions and certain exclusions from income to cause nontaxability by themselves, but high-income returns are more often nontaxable as a result of a combination of reasons, none of which, by itself, would result in nontaxability. Moreover, some items, which singly or in combination may eliminate “regular tax” liability, i.e., income tax excluding the alternative minimum tax (AMT), cannot eliminate an AMT liability, since these items give rise to adjustments or preferences for AMT purposes.

Because they do not generate AMT adjustments or preferences, tax-exempt bond interest, itemized deductions for interest expense, miscellaneous item-

ized deductions not subject to the 2-percent-of-AGI floor, casualty or theft losses, and medical expenses (exceeding 10 percent of AGI) could, by themselves, produce nontaxability.¹⁰

Due to the AMT exemption of \$58,000 on joint returns (\$40,250 on single and head-of-household returns and \$29,000 on returns of married taxpayers filing separately), a return could have been nontaxable, even though it included some items that produced AMT adjustments or preferences.¹¹ Further, since the starting point for “alternative minimum taxable income” was taxable income for regular tax purposes, a taxpayer could have adjustments and preferences exceeding the AMT exclusion without incurring AMT liability. This situation could occur if taxable income for regular tax purposes was sufficiently negative, due to itemized deductions and personal exemptions exceeding AGI, that the taxpayer’s AMT adjustments and preferences are less than the sum of the AMT exclusion and the amount by which regular taxable income is below zero. Note that, because of the AMT, taxpayers may have found it beneficial to report additional deduction items on their tax returns, even if the items did not produce a benefit for regular tax purposes.

Tables 7 and 8 classify tax returns by the items that had the largest and second largest effects in reducing or eliminating income tax. For returns on which each of the largest effects was identified, the tables show each of the second largest effects.¹² For example, Table 7 shows that, on taxable returns with some U.S. income tax and expanded income of \$200,000 or more, the taxes paid deduction was the most important item 52.2 percent of the time. Where this was the primary item, the interest paid deduction was the second most important item 60.1 percent of the time, and the charitable contributions deduction was the second most important item 27.0 percent of the time.

Table 8 shows that, on returns without any worldwide tax and expanded income of \$200,000 or more, the most important item in eliminating tax, on 44.3 percent of returns, was the exclusion for State and local government interest (“tax-exempt interest”). For these returns, the itemized deduction for

¹⁰ For Tax Year 2005, the deduction for charitable contributions could also fall into this class if it was made after August 27, 2005, and before January 1, 2006. Such deductions were not subject to the 50 percent adjusted gross income limitation or the overall limitation on itemized deductions.

¹¹ The AMT exclusion phases out above certain levels of “alternative minimum taxable income,” based on filing status, but, since taxpayers will have some AMT liability in the phaseout range, the phaseout income is not relevant for nontaxable, high-income returns.

¹² Tax-exempt interest and the foreign-earned income exclusion were not included in Tables 7 and 8 as possible tax effects before Tax Year 1994. Thus, caution should be exercised in making comparisons between data prior to 1994 and after 1993.

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taxes paid was the second most important item 25.1 percent of the time, and the deduction for medical and dental expenses was the second most important item 22.0 percent of the time.

The four categories with the largest effect in reducing taxes on high adjusted-gross-income returns with no worldwide income tax were the total miscellaneous deductions (1,112 returns, or 26.3 percent of the 4,224 tabulated returns with AGI of \$200,000 or more and with no worldwide tax liability); net casualty or theft loss deduction (863 returns, or 20.4 percent); charitable contributions deduction (837 returns, or 19.8 percent); and investment interest expense deduction (444 returns, or 10.5 percent). These effects are also shown in Figure E.

The four categories that most frequently had the largest effect in reducing taxes for high expanded-income returns with no worldwide income tax were tax-exempt interest (2,399 returns, or 44.3 percent of the 5,420 tabulated returns with expanded income of \$200,000 or more and with no worldwide tax liability);

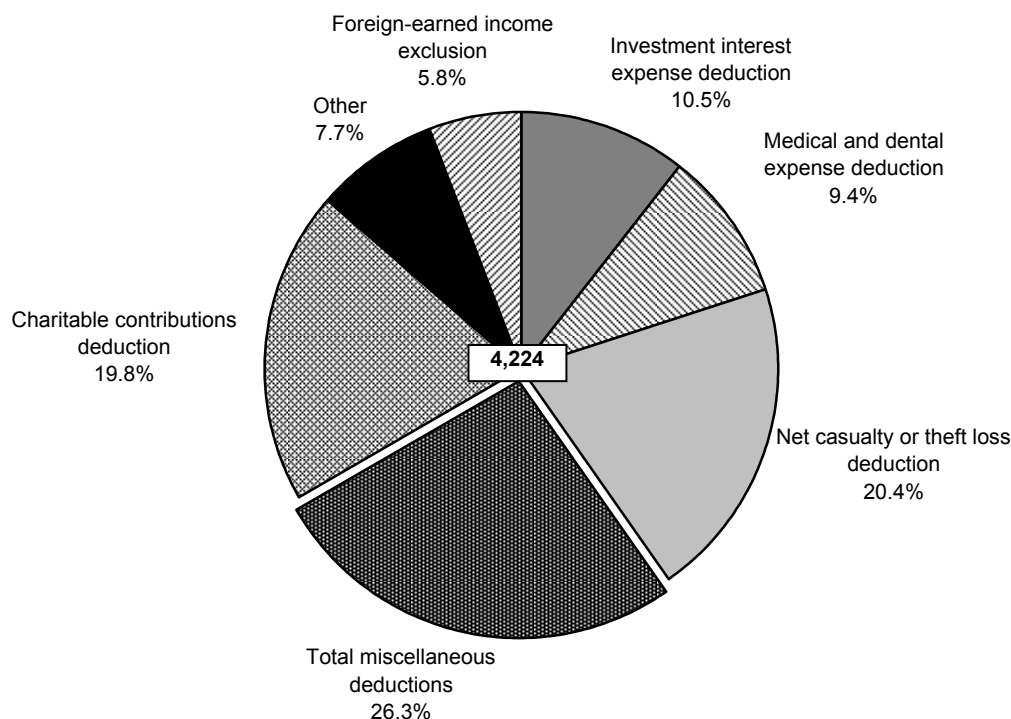
net casualty or theft loss deduction (862 returns, or 15.9 percent); charitable contributions deduction (844 returns, or 15.6 percent); and medical and dental expense deductions (680 returns, or 12.5 percent). These effects are also shown in Figure F.

Table 8 also shows the two items that most frequently had the second largest effect in reducing regular tax liability for high expanded-income returns with no worldwide tax. These were the deduction for taxes paid (1405 returns, or 25.9 percent) and tax-exempt interest (908 returns, or 16.8 percent).

Tables 9 and 10 present another way of illustrating the importance of various tax provisions in reducing or eliminating income tax. Unlike Tables 7 and 8, these tables cover only nontaxable returns, i.e., returns showing no income tax liability. Tables 9 and 10 show the number of times that various items reduced income by different percentages of income. The items shown are the various categories of itemized deductions, the deduction equivalents of two different types of tax credits, and total tax prefer-

Figure E

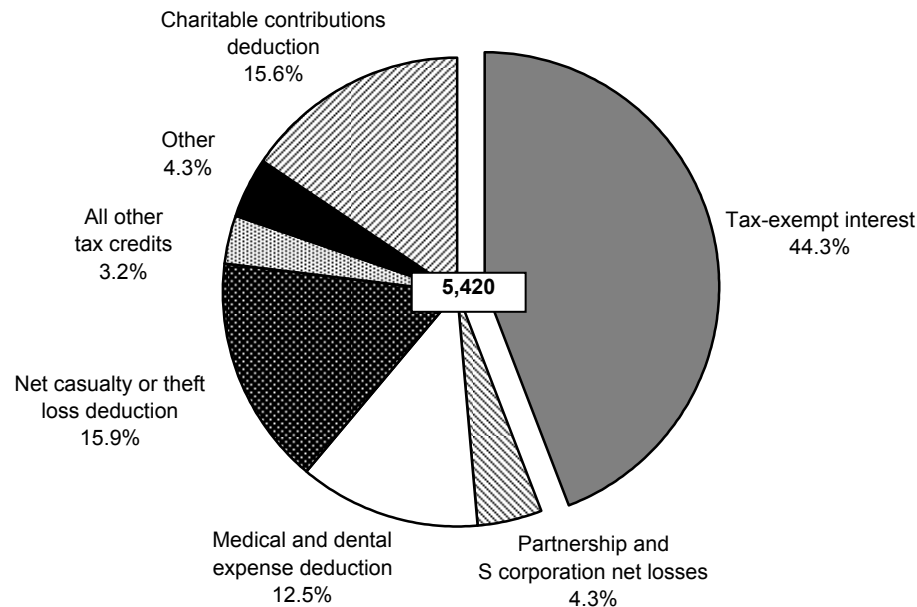
Returns with No Worldwide Income Tax and with Adjusted Gross Income of \$200,000 or More: Primary Reasons for Reduced Income Tax Liabilities, Tax Year 2005



NOTE: Details may not add to 100 percent due to rounding.

Figure F

Returns with No Worldwide Income Tax and with Expanded Income of \$200,000 or More: Primary Reasons for Reduced Income Tax Liabilities, Tax Year 2005



NOTE: Detail may not add to 100 percent due to rounding.

ences excluded from income. For example, for high expanded-income returns with no worldwide income tax (Table 10), the itemized deduction for casualty or theft losses exceeded 100 percent of expanded income on 591 of the 5,420 returns, but there was no casualty or theft loss deduction on 4,426 returns.

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Appendix A: Income Concepts

Congress wanted data on high-income taxpayers classified by an income concept that was more comprehensive than adjusted gross income (AGI), but that was based entirely on items already reported on income tax returns. In order to derive such an income concept, it was necessary to begin with a broad, inclusive concept of income. AGI must then be compared to this broad income concept, and the differences (both additions and subtractions) that can be determined from items reported on tax returns identified.

This appendix begins by defining “Haig-Simons income,” a very broad concept of income used by economists and others as a standard. AGI is then compared to Haig-Simons income, and the major differences between the two income concepts are listed. The final section defines “expanded income,” a more comprehensive income measure than AGI, based entirely on tax return data.

Haig-Simons Income

The broadest measure of annual income generally used by economists and others is defined as the value of a household’s consumption plus the change, if

any, in its net worth. This income concept is referred to as Haig-Simons income, or H-S income, after the two economists who wrote extensively about it [A1]. The H-S income of a household that consumed \$25,000 and saved \$2,000 in a year would be \$27,000. Alternatively, the H-S income of a household that consumed \$25,000 and had no additions to savings, but had assets that declined in value by \$1,000 in a year, would be \$24,000.

H-S income consists of three broad components: labor income, capital income (income from assets), and income from transfer payments. The major elements of each of these three components are as follows:

- **Labor income**—This includes all forms of employee compensation (including wages and salaries), employee fringe benefits (such as employer-provided health insurance and accrued pension benefits or contributions), and the employer share of payroll taxes (such as Social Security taxes). Labor income also includes the labor share of self-employment income. Expenses of earning labor income would be deducted in arriving at H-S income. Deferred labor income (such as pension benefits) would be counted in the year it was earned, rather than in the year it was received.
- **Capital income**—This includes all income from assets, including interest, dividends, rents, royalties, accrued capital gains (whether or not realized), the capital income share of self-employment income, and the rental value of consumer durables (most importantly, the rental value of owner-occupied housing). Capital income is measured in real (inflation-adjusted) terms and is net of real, economic depreciation and all other expenses (which could exceed capital income).
- **Transfer payments**—These include payments in cash (such as Social Security benefits, workers’ compensation, unemployment benefits, Aid to Families with Dependent Children (AFDC), and noncash benefits (such as Medicare, Medicaid, and food stamps).

For purposes of tax analysis, H-S income should be measured on a pretax basis, the amount that would be earned if there were no Federal income tax in place. Most items of income are unaffected, or little

affected, by the income tax and so are reported on a pretax basis. However, certain income items from tax-preferred sources may be reduced because of their preferential treatment.

An example is interest from tax-exempt State and local government bonds. The interest rate on tax-exempt bonds is generally lower than the interest rate on taxable bonds of the same maturity and risk, with the difference approximately equal to the tax rate of the typical investor in tax-exempt bonds. Thus, investors in tax-exempt bonds are effectively paying a tax, referred to as an “implicit tax,” and tax-exempt interest as reported is measured on an after-tax, rather than a pretax, basis. Income from all tax-preferred sources should be “grossed up” by implicit taxes to properly measure H-S income.

Adjusted Gross Income

AGI is the statutory definition of income for Federal income tax purposes. AGI differs from H-S income by excluding some components of H-S income and by allowing accelerated business deductions and deductions unrelated to income, but also by disallowing or limiting certain expenses of earning income and certain losses. In addition, AGI is not “grossed up” for implicit taxes.

The components of H-S income excluded from AGI include most employee fringe benefits, the employer share of payroll taxes, accrued but deferred employee compensation, accrued but unrealized real capital gains, the rental value of consumer durables, most Social Security benefits, most other cash transfers, all noncash transfers, and the real incomes of borrowers due to inflation [A2].

Depreciation and certain other expenses allowed in determining AGI may be accelerated (relative to economic depreciation and other costs) in the early years of an investment, thus understating investment income. In later years, however, investment income in AGI will be overstated because depreciation and other accelerated expenses will then be understated. AGI also excludes some expenses not related to earning income, such as contributions to self-employed retirement (Keogh) plans, deductible contributions to Individual Retirement Arrangements (IRAs), the portion of Social Security contributions for self-employed workers that is analogous to the employer share of such contributions for employees, and contributions to medical savings accounts.

AGI generally *exceeds* H-S income to the extent that expenses of earning income and losses are limited or disallowed. Most of the expenses of earning income are deductible *from* AGI in calculating taxable income, but only if the taxpayer “itemizes” deductions and then, in some cases, only to the extent that the sum of all such items exceeds 2 percent of AGI.

Expenses incurred in the production of income that are itemized deductions include certain expenses of employees (such as union dues; expenditures for items used on the job but not reimbursed by the employer; and the employees’ travel, meal, and entertainment expenses); and expenses attributable to a taxpayer’s (passive) investments (as opposed to active participation in a trade or business, for example), including, but not limited to, interest expense incurred in connection with investments in securities [A3]. Note that there are limits on certain types of deductible expenses. In particular, deductible meal and entertainment expenses are limited to 50 percent of total meal and entertainment expenses.

Although net capital losses reduce economic income, only the first \$3,000 of net realized capital losses may be deducted in computing AGI. Any additional realized losses must be carried forward to future years. In a somewhat similar manner, passive losses (from investments in a trade or business in which the taxpayer does not materially participate) can also reduce economic income, but, in computing AGI, they can only be deducted from passive income from other, similar investments (although a larger amount may be deducted when the losses are from rental real estate activities).

AGI can also exceed H-S income because of differences in the timing of income between the two concepts. For example, a taxpayer may realize more capital gains in a year than he or she accrues in capital gains. Since AGI includes only realizations of capital gains, whereas H-S income includes only accruals, AGI in this circumstance would exceed H-S income. Finally, just as AGI understates the income of borrowers due to inflation, it overstates the income of lenders, who include bond owners and owners of bank deposits.

Expanded Income

Expanded income is meant to be a measure of income that is conceptually closer to H-S income

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than AGI, but which is derived entirely from items already reported on income tax returns. Figure G shows the adjustments made to AGI to arrive at expanded income. Since the definition of AGI was changed by legislation several times since 1977, and certain reporting requirements also changed, the adjustments differ over the years, as indicated for each item [A4]. Most of these adjustments are relatively straightforward, but the adjustment for investment requires some explanation.

Figure G

Derivation of Expanded Income from Adjusted Gross Income, Tax Years 1977-2005

Adjusted gross income (AGI)

- PLUS:
- o Excluded capital gains (tax years prior to 1987)
 - o Tax-exempt interest (1987 and later tax years)
 - o Nontaxable Social Security benefits (1987 and later tax years)
 - o Tax preferences for alternative minimum tax purposes [A5]
 - o Foreign-earned income exclusion (1990 and later tax years)
- MINUS:
- o Unreimbursed employee business expenses [A4]
 - o Nondeductible rental losses (Tax Year 1987)
 - o Moving expense deduction (Tax Years 1987 through 1993) [A4]
 - o Investment interest expense deduction to the extent it does not exceed investment income
 - o Miscellaneous itemized deductions not subject to the 2-percent-of-AGI floor (1989 and later tax years)

EQUALS: o Expanded income

NOTE: Footnotes to Figure G are included with the footnotes to Appendix A.

Investment Interest

In measuring H-S income, it generally would be appropriate to deduct all expenses incurred in the production of income, including those related to any income-producing investments, without limit. Investment expenses in excess of investment income would then represent net economic losses. However, such a liberal deduction for investment-related expenses is not necessarily correct when not all income items have been included currently. (Investment income includes interest, dividends, and capital gains.)

If all income has not been included currently, full deduction of investment expenses might represent a mismatching of receipts and expenses and might result in *understating* income. For example, if a tax-

payer borrowed funds to purchase securities, net income would be understated if the taxpayer deducted all interest payments on the loan, but did not include as income any accrued gains on the securities. A similar mismatching of income and expenses would occur if investment expenses that should properly be capitalized were deducted when paid. In these instances, a more accurate measure of income might be obtained by postponing the deduction of the expense until such time as the income were recognized for tax purposes.

Additional problems are created when a person with a loan has both income-producing assets, such as securities, and nonincome-producing assets, such as a vacation home or yacht. It is not possible to determine what portion of the interest expense should be attributed to taxable income-producing assets and, therefore, ought to be deductible against the gross receipts from such taxable assets. As a result of these problems, it has been necessary to set arbitrary limits on the amount of investment expenses that are deductible in calculating expanded income.

Investment expenses that have not been deducted in determining AGI generally can appear on a Federal individual income tax return in two places. Investment interest expense is taken into account in the calculation of the itemized deduction for interest paid. Deductible investment interest expense is a separate part of the total interest deduction. Other investment expenses, such as management fees, are included in the miscellaneous category of itemized deductions [A5].

Beginning with 1987, most types of income-producing expenses included as miscellaneous itemized deductions are only deductible to the extent that their total exceeds 2 percent of AGI. To determine expenses that should be deductible in calculating an approximation of H-S income, investment expenses have been defined as deductible investment interest expenses. Other investment expenses could not be separated from the remainder of miscellaneous deductions. Hence, they have not been used in the adjustment for investment expenses.

To the extent that interest expenses do *not* exceed investment income, they are generally allowed as a deduction in the computation of deductible investment interest expense and thus expanded income. Investment interest expenses that do *exceed* investment income are *not* deductible in calculating expanded income. One consequence of this definition is that

investment expenses can never turn positive investment income into investment losses. Generally, allowing investment expenses to offset all investment income is generous and tends to understate broadly-measured income. However, in some instances, limiting investment expenses to investment income may *overstate* income by disallowing genuine investment losses.

Notes to Appendix A

- [A1] Haig, Robert M. (editor) (1921), *The Federal Income Tax*, Columbia University Press, and Simons, Henry C. (1938), *Personal Income Taxation*, University of Chicago Press.
- [A2] Borrowers receive income due to inflation because the real value of debt is reduced by inflation. Even though inflation may be anticipated and reflected in interest rates, tax deductions for nominal interest payments overstate interest costs because part of these payments represent a return of principal to the lender, rather than interest.
- [A3] See references and A4.
- [A4] For 1977, 50 percent of net long-term capital gains were included in AGI. During 1978, the inclusion ratio was changed to 40 percent. This inclusion ratio remained unchanged through 1986. Beginning with 1987, there was no exclusion allowed for capital gains in computing AGI, and, thus, this adjustment was not made in computing expanded income for returns for years after 1986.

Beginning in 1987, taxpayers were required to report on their Federal income tax returns the amounts of their tax-exempt interest income from State and local government bonds. Since 1987, tax-exempt interest has been included in expanded income.

Taxpayers are also required to report Social Security benefits. Since 1988, nontaxable Social Security benefits have been included in expanded income. However, if none of a particular taxpayer's Social Security benefits are taxable, then gross Social Security benefits are not required to be shown on the income

tax return. In such instances, which generally only affect lower- and middle-income taxpayers, Social Security benefits are not included in expanded income.

The subtraction of unreimbursed employee business expense and the moving expense deduction is to make the concept of expanded income comparable to years prior to 1987. All current-year moving expenses beginning with Tax Year 1994 were deducted in the calculation of AGI as a statutory adjustment.

Due to subtracting nonlimited miscellaneous deductions and not subtracting the nondeductible rental loss for 1989, the expanded income concept for 1989 is not strictly comparable to expanded income for 1988. Nor is the expanded income concept for 1990 strictly comparable to expanded income for 1989 because of the addition of the foreign-earned income exclusion. Specific details on the definition of expanded income for any given year are available in the reports and publications found under the Reference Section.

- [A5] Some income deferrals and accelerated expense deductions may also be involved in income or losses from rental property, from royalties, from partnerships, and from S corporations, only the net amounts of which are included in adjusted gross income.

Appendix B: Tax Concepts

This appendix provides a brief summary of the U.S. taxation of worldwide income and the foreign tax credit. The two tax concepts used in this article are then defined. The following section explains the computation of the deduction equivalent of credits and other items. A final section discusses the possible implications of the use of unaudited tax return data for this article.

U.S. Taxation of Worldwide Income and the Foreign Tax Credit

Citizens and residents of the United States, regardless of where they physically reside, must generally include in income for Federal income tax purposes income from all geographic sources. Thus, for example, dividends and interest received from a foreign

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corporation or income earned working abroad is subject to Federal income tax in the same manner as income received from sources inside the United States [B1]. Income from sources outside the United States may also be subject to tax by foreign governments.

To reduce, if not eliminate, the possibility of double taxation of the foreign-source income of U.S. citizens and residents, the Federal income tax allows a credit for income taxes paid to foreign governments. This foreign tax credit is generally limited to the amount of (precredit) U.S. tax liability attributable to foreign-source income. This limit prevents the foreign tax credit from offsetting the U.S. tax on U.S.-source income.

As a result of taxing citizens and residents on a worldwide basis but allowing a foreign tax credit, some Federal income tax returns may report substantial income but little or no U.S. tax liability after credits. This may occur, for example, if a taxpayer has income only from foreign sources (the taxpayer may live abroad the entire year and have no income-producing assets in the United States), or if a taxpayer has foreign-source income that exceeds a net loss from U.S. sources and pays income taxes to a foreign government that are comparable to the U.S. tax [B2].

For taxpayers with income from foreign sources, these procedures understate the taxpayers' true worldwide income tax liabilities and effective income tax rates. For such taxpayers, it does not seem appropriate to classify U.S. income tax credits for foreign tax payments as reducing tax liabilities. This is particularly true for tax filers who appear to be nontaxable because they do not have any U.S. tax liability, but who have paid foreign income taxes. A more accurate measure of overall income tax burden, as well as the numbers of nontaxable returns, can be obtained by considering all income taxes—U.S. as well as foreign. Thus, a second tax concept, worldwide income tax, has been used in addition to the traditional U.S. income tax.

Two Tax Concepts

Two tax concepts are used in this article to classify tax returns as taxable (i.e., returns showing an income tax liability) or nontaxable (i.e., returns showing no income tax liability) and to measure the tax burdens on taxable returns: U.S. income tax and worldwide income tax. Worldwide income tax is defined for purposes of this article as U.S. income

tax plus the foreign tax credits reported on the U.S. income tax return and foreign taxes paid on excluded foreign-earned income (obtained from Form 1116, *Foreign Tax Credit*). The amount of the foreign tax credits and foreign taxes paid on excluded foreign-earned income is used as a proxy for foreign tax liabilities [B3]. The relationship of U.S. income tax to tax items reported on individual income tax returns, and to worldwide income tax, is shown in Figure H.

Figure H

Derivation of "U.S. Income Tax" and "Worldwide Income Tax," Tax Year 2005

Tax at regular rates (tax generated)

PLUS: Additional taxes (such as tax on accumulation distributions from qualified retirement plans, Form 4972)

PLUS: Alternative minimum tax (Form 6251)

EQUALS: Income tax before credits

MINUS: Tax credits

EQUALS: U.S. income tax

PLUS: Foreign tax credit

PLUS: Foreign taxes paid on excluded foreign-earned income (Form 1116)

EQUALS: Worldwide income tax

Comparing Exclusions, Deductions, Tax Credits, and Special Tax Computations

In order to compare the importance of various exclusions, deductions, tax credits, and special tax computations (such as the alternative minimum tax on tax preferences), the different types of items must be placed on the same basis. One way of doing so is to calculate the size of the deduction that would reduce (or increase) income tax by the same amount as a tax credit or special computation. This amount is called the "deduction equivalent" of the tax credit or special computation.

The deduction equivalent of a tax credit or a special tax computation is the difference between the taxable income that, using the ordinary tax rate schedules, would yield the actual tax before the provision in question is considered and the actual tax after the provision. For example, the "deduction

equivalent of all tax credits” is equal to the difference between “taxable income that would yield income tax before credits” and “taxable income that would yield income tax after credits.”

Using this method of equating the value of deductions, exclusions, credits, and special tax computations, the order in which the various credits and special tax computations are calculated may affect the value of their deduction equivalents. Because the tax rate schedules are progressive, with successive increments to income taxed at successively higher tax rates, the deduction equivalent of the credit converted last to a deduction equivalent will be larger (for the same amount of a credit) than the item converted first, unless all relevant taxable income amounts are within a single tax-rate bracket.

The deduction equivalents of tax credits shown in Tables 9 and 10 were computed by assuming that deductions and exclusions reduce taxes before credits. As a result, the deduction equivalent of tax credits may be overstated.

Unaudited Data

Tax return data used for Statistics of Income have been tabulated as they were reported on tax returns filed with the Internal Revenue Service (IRS). Certain obvious arithmetic errors have been corrected and certain adjustments have been made to achieve consistent statistical definitions. Otherwise, the data have not been altered. In particular, the data do not reflect any changes that may have been or could be made as a result of IRS audits. While this is true of data throughout the entire Statistics of Income program, it is particularly relevant for high-income tax returns. Because of the greater complexity of these returns, there is a higher probability of error and

more scope for disagreement about the proper interpretation of tax laws.

The fact that the data have been drawn from unaudited returns is of even greater importance for those high-income returns that are nontaxable. Almost any audit changes would make such returns taxable. Even where the tax consequences are minor, such returns could be reclassified from nontaxable to taxable, thereby changing the counts of nontaxable returns.

Notes to Appendix B

- [B1] An exception is that certain income earned abroad may be excluded from AGI. Any foreign taxes paid on such income are not creditable against U.S. income tax. The tables in this article include such excluded income in expanded income. Foreign taxes paid on such income are reflected in worldwide income tax, as discussed later.
- [B2] Although the foreign tax credit is an item of tax preference for AMT purposes, taxpayers below the AMT exclusion thresholds, or with preferences or deductions not subject to AMT, could completely offset pre-credit U.S. income tax liability with foreign tax credits.
- [B3] Where foreign tax rates exceed U.S. rates, foreign tax credits will be less than foreign tax liabilities. In such cases, using foreign tax credits as a proxy for foreign tax liabilities understates worldwide income tax liability. In other cases, when foreign tax credits are for taxes paid on income from previous years, use of foreign tax credits as a proxy may overstate *or* understate worldwide taxes on current-year income.

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Table 1. Returns With and Without U.S. Income Tax: Number of Returns, by Size of Income Under Alternative Concepts, Tax Year 2005

[All figures are estimates based on samples]

Returns by tax status, size of expanded income	All returns	Returns by size of adjusted gross income			
		Under \$50,000 [1]	\$50,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)
All returns					
Total	134,372,678	91,195,160	28,801,026	10,810,367	3,566,125
Under \$50,000 [1]	90,292,532	89,467,670	809,608	11,189	4,064
\$50,000 under \$100,000	29,853,509	1,689,622	27,727,119	431,877	4,890
\$100,000 under \$200,000	10,642,626	35,443	257,796	10,283,960	65,427
\$200,000 or more	3,584,012	2,424	6,503	83,341	3,491,744
Returns with U.S. income tax					
Total	92,343,188	50,195,911	27,821,158	10,767,383	3,558,736
Under \$50,000 [1]	49,379,651	48,667,302	703,713	5,808	2,828
\$50,000 under \$100,000	28,807,139	1,509,077	26,864,708	428,657	4,696
\$100,000 under \$200,000	10,583,067	18,322	247,331	10,252,321	65,093
\$200,000 or more	3,573,331	1,210	5,406	80,596	3,486,119
Returns without U.S. income tax					
Total	42,029,489	40,999,249	979,868	42,984	7,389
Under \$50,000 [1]	40,912,880	40,800,368	105,895	5,381	1,236
\$50,000 under \$100,000	1,046,370	180,545	862,411	3,220	194
\$100,000 under \$200,000	59,558	17,121	10,464	31,639	334
\$200,000 or more	10,680	1,214	1,097	2,744	5,625

[1] Includes returns with adjusted gross deficit or with negative expanded income.

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

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Table 2. Returns With and Without Worldwide Income Tax: Number of Returns, by Size of Income Under Alternative Concepts, Tax Year 2005

[All figures are estimates based on samples]

Returns by tax status, size of expanded income	All returns	Returns by size of adjusted gross income			
		Under \$50,000 [1]	\$50,000 under \$100,000	\$100,000 under \$200,000	200,000 or more
	(1)	(2)	(3)	(4)	(5)
All returns					
Total	134,372,678	91,195,160	28,801,026	10,810,367	3,566,125
Under \$50,000 [1]	90,292,532	89,467,670	809,608	11,189	4,064
\$50,000 under \$100,000	29,853,509	1,689,622	27,727,119	431,877	4,890
\$100,000 under \$200,000	10,642,626	35,443	257,796	10,283,960	65,427
\$200,000 or more	3,584,012	2,424	6,503	83,341	3,491,744
Returns with worldwide income tax					
Total	92,546,925	50,347,653	27,859,501	10,777,870	3,561,901
Under \$50,000 [1]	49,520,556	48,807,439	704,470	5,808	2,838
\$50,000 under \$100,000	28,847,168	1,515,434	26,897,916	429,104	4,714
\$100,000 under \$200,000	10,600,609	23,518	251,402	10,260,550	65,139
\$200,000 or more	3,578,591	1,262	5,712	82,407	3,489,210
Returns without worldwide income tax					
Total	41,825,753	40,847,507	941,526	32,497	4,224
Under \$50,000 [1]	40,771,976	40,660,231	105,138	5,381	1,226
\$50,000 under \$100,000	1,006,340	174,188	829,203	2,773	176
\$100,000 under \$200,000	42,017	11,925	6,394	23,410	288
\$200,000 or more	5,420	1,162	791	933	2,534

[1] Includes returns with adjusted gross deficit or with negative expanded income.

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

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Table 3. Returns With and Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Distribution of Returns by Ratio of Adjusted Taxable Income to Income Per Concept, Tax Year 2005

[All figures are estimates based on samples]

Tax status, ratio of adjusted taxable income to income per concept	Adjusted gross income concept			Expanded income concept		
	Number of returns	Percentage of total	Cumulative percentage of total	Number of returns	Percentage of total	Cumulative percentage of total
	(1)	(2)	(3)	(4)	(5)	(6)
Total	3,566,125	100.0	100.0	3,584,012	100.0	100.0
Returns without U.S. income tax	7,389	0.2	0.2	10,680	0.3	0.3
Returns with U.S. income tax: Total	3,558,736	99.8	N/A	3,573,331	99.7	N/A
Ratio of adjusted taxable income to income per concept:						
Over 0 under 5 percent	5,867	0.2	0.2	8,904	0.2	0.2
5 under 10 percent	6,299	0.2	0.3	13,983	0.4	0.6
10 under 15 percent	7,948	0.2	0.6	10,868	0.3	0.9
15 under 20 percent	9,349	0.3	0.8	8,003	0.2	1.2
20 under 25 percent	8,071	0.2	1.1	13,668	0.4	1.5
25 under 30 percent	10,661	0.3	1.4	16,072	0.4	2.0
30 under 35 percent	13,786	0.4	1.7	17,304	0.5	2.5
35 under 40 percent	20,469	0.6	2.3	27,827	0.8	3.3
40 under 45 percent	37,733	1.1	3.4	43,263	1.2	4.5
45 under 50 percent	68,917	1.9	5.3	74,597	2.1	6.5
50 under 60 percent	226,717	6.4	11.7	240,733	6.7	13.3
60 under 70 percent	318,932	9.0	20.6	324,020	9.1	22.3
70 under 80 percent	625,428	17.6	38.1	598,823	16.8	39.0
80 percent or more	2,198,559	61.8	99.8	2,175,267	60.9	99.7

N/A—Not Applicable.

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

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Table 4. Returns With and Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Distribution of Returns by Ratio of Adjusted Taxable Income to Income Per Concept, Tax Year 2005

[All figures are estimates based on samples]

Tax status, ratio of adjusted taxable income to income per concept	Adjusted gross income concept			Expanded income concept		
	Number of returns	Percentage of total	Cumulative percentage of total	Number of returns	Percentage of total	Cumulative percentage of total
	(1)	(2)	(3)	(4)	(5)	(6)
Total	3,566,125	100.0	100.0	3,584,012	100.0	100.0
Returns without worldwide income tax	4,224	0.1	0.1	5,420	0.2	0.2
Returns with worldwide income tax: Total	3,561,901	99.9	N/A	3,578,591	99.8	N/A
Ratio of adjusted taxable income to income per concept:						
Over 0 under 5 percent	2519	0.1	0.1	3869	0.1	0.1
5 under 10 percent	2721	0.1	0.1	5320	0.1	0.3
10 under 15 percent	3894	0.1	0.3	3878	0.1	0.4
15 under 20 percent	4912	0.1	0.4	4286	0.1	0.5
20 under 25 percent	6095	0.2	0.6	9883	0.3	0.8
25 under 30 percent	8040	0.2	0.8	13032	0.4	1.1
30 under 35 percent	11264	0.3	1.1	15238	0.4	1.5
35 under 40 percent	18635	0.5	1.6	24720	0.7	2.2
40 under 45 percent	35241	1	2.6	39366	1.1	3.3
45 under 50 percent	63942	1.8	4.4	70520	2	5.3
50 under 60 percent	220293	6.2	10.6	237346	6.6	11.9
60 under 70 percent	316382	8.9	19.5	325869	9.1	21
70 under 80 percent	620906	17.4	36.9	598482	16.7	37.7
80 percent or more	2247058	63.1	99.9	2226783	62.2	99.8

N/A—Not Applicable.

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

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Table 5. Returns With and Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Income, Deductions, Credits, and Tax, by Tax Status, Tax Year 2005

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

Income concept, item	Returns with income of \$200,000 or more					
	Total		Returns with U.S. income tax		Returns without U.S. income tax	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
Adjusted gross income concept						
Salaries and wages	3,037,602	917,754,477	3,033,010	916,303,403	4,592	1,451,074
Business or profession:						
Net income	711,757	84,176,298	710,574	84,031,279	1,183	145,019
Net loss	225,010	5,914,517	224,313	5,824,130	697	90,387
Farm:						
Net income	25,943	1,440,185	25,904	1,437,548	39	2,637
Net loss	77,794	3,329,303	77,619	3,297,427	175	31,876
Partnership and S corporation net income after Section 179 property deduction [1]:						
Net income	1,246,960	397,841,799	1,245,340	397,390,780	1,620	451,019
Net loss	375,955	34,552,297	374,456	33,639,395	1,499	912,902
Sales of capital assets:						
Net gain	1,835,002	557,831,935	1,831,810	556,194,208	3,192	1,637,727
Net loss	962,873	2,461,233	960,547	2,454,865	2,326	6,368
Sales of property other than capital assets:						
Net gain	194,327	6,253,352	193,826	6,227,867	501	25,485
Net loss	211,463	2,814,355	210,961	2,768,537	502	45,818
Taxable interest received	3,399,578	71,302,458	3,393,074	70,318,808	6,504	983,650
Tax-exempt interest	978,981	32,690,464	976,833	32,233,846	2,148	456,618
Dividends	2,792,525	91,015,212	2,787,127	90,248,607	5,398	766,606
Qualified dividends	2,574,956	70,899,940	2,570,257	70,310,122	4,699	589,818
Pensions and annuities in adjusted gross income	722,297	29,022,912	720,904	28,945,132	1,393	77,780
Rent:						
Net income	471,190	22,088,356	470,270	22,032,685	920	55,672
Net loss, total (deductible and nondeductible)	478,148	9,454,651	477,001	9,386,109	1,147	68,542
Nondeductible rental loss	275,998	4,333,502	275,228	4,310,979	770	22,523
Royalty:						
Net income	211,903	9,735,263	211,259	9,673,578	644	61,685
Net loss	6,371	92,243	6,351	90,343	20	1,900
Estate or trust:						
Net income	90,448	13,224,453	90,121	13,190,673	326	33,781
Net loss	11,458	963,278	11,386	946,934	72	16,345
State income tax refunds	1,246,228	6,201,745	1,244,782	6,176,574	1,446	25,171
Alimony received	7,179	1,254,454	7,171	1,253,785	8	668
Social Security benefits in adjusted gross income	581,486	10,782,907	579,761	10,751,913	1,725	30,993
Social Security benefits (nontaxable)	581,497	1,903,174	579,768	1,897,642	1,729	5,533
Unemployment compensation	72,021	396,185	71,922	395,780	99	405
Other income	517,882	16,105,911	516,634	16,007,931	1,248	97,980
Other loss	38,455	1,873,114	37,712	1,840,512	743	32,602
Foreign-earned income exclusion	34,850	2,540,344	32,936	2,378,120	1,914	162,224
Total income	3,566,125	2,198,789,963	3,558,736	2,193,765,747	7,389	5,024,216
Statutory adjustments, total	1,569,936	28,641,540	1,567,640	28,605,345	2,296	36,194
Payments to Individual Retirement Arrangements	140,860	959,748	140,661	958,593	199	1,155
Payments to self-employed retirement (Keogh) plans	386,912	11,529,427	386,678	11,522,683	234	6,744
Moving expenses adjustment	35,694	264,022	35,601	263,191	93	831
Adjusted gross income	3,566,125	2,170,148,423	3,558,736	2,165,160,401	7,389	4,988,022
Investment interest expense deduction	653,754	16,723,479	651,504	15,999,707	2,250	723,772
Total tax preferences excluded from adjusted gross income	993,209	35,542,553	991,068	35,082,833	2,141	459,720
Total alternative minimum tax preference items (excluding tax-exempt interest from private activity bonds)	26,895	2,868,205	26,861	2,863,389	34	4,815
Passive activity loss (alternative minimum tax adjustment)	594,744	4,991	593,836	4,113	908	878
Expanded income	3,565,995	2,177,847,646	3,558,736	2,173,667,141	7,259	4,180,505

Footnotes at end of table.

High-Income Tax Returns for 2005

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Table 5. Returns With and Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Income, Deductions, Credits, and Tax, by Tax Status, Tax Year 2005—Continued

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

Income concept, item	Returns with income of \$200,000 or more					
	Total		Returns with U.S. income tax		Returns without U.S. income tax	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
Adjusted gross income concept—continued						
Exemption amount	1,995,412	13,139,518	1,991,720	13,117,805	3,692	21,713
Itemized deductions:						
Total per adjusted gross income concept	3,338,816	266,425,646	3,332,754	262,597,689	6,062	3,827,957
Charitable contributions deduction	3,197,215	76,123,864	3,192,290	74,789,094	4,925	1,334,770
Interest paid deduction:						
Total per adjusted gross income concept	2,825,656	69,373,134	2,821,054	68,518,851	4,601	854,283
Total home mortgage interest	2,679,860	52,409,221	2,676,014	52,279,683	3,846	129,538
Medical and dental expense deduction	69,752	2,070,082	69,003	1,937,697	749	132,385
Net casualty or theft loss deduction	61,196	2,224,553	60,197	1,767,333	999	457,221
Taxes paid deduction	3,334,579	139,413,292	3,328,880	139,105,533	5,699	307,759
Net limited miscellaneous deductions per adjusted gross income concept	527,890	11,038,079	526,106	10,912,350	1,784	125,729
Non-limited miscellaneous deductions	206,438	9,470,528	204,807	8,766,295	1,631	704,233
Excess of exemptions and deductions over adjusted gross income	6,473	2,051,743	2,708	1,299,421	3,765	752,322
Taxable income	3,559,568	1,890,509,931	3,556,028	1,888,630,309	3,540	1,879,622
Tax at regular rates	3,559,579	475,594,761	3,556,043	475,123,322	3,536	471,438
Alternative minimum tax (Form 6251)	2,206,295	14,166,767	2,206,278	14,166,530	17	237
Income tax before credits	3,562,273	489,773,293	3,558,736	489,301,618	3,537	471,676
Tax credits:						
Total	1,445,105	10,014,638	1,441,568	9,542,962	3,537	471,676
Child care credit	225,594	122,198	225,536	122,178	58	20
Minimum tax credit	111,338	843,986	110,733	821,331	605	22,654
Foreign tax credit	1,173,001	8,216,854	1,169,837	7,769,509	3,164	447,345
General business credit	73,693	649,974	73,563	649,140	130	835
U.S. total income tax	3,558,736	479,759,018	3,558,736	479,759,018	0	0
Taxable income which would yield:						
Income tax before credits	3,562,273	1,634,526,882	3,558,736	1,632,975,827	3,537	1,551,055
Income tax after credits	3,558,734	1,604,674,399	3,558,734	1,604,674,399	0	0
U.S. total income tax	3,558,736	1,604,675,458	3,558,736	1,604,675,458	0	0
Reconciliation of adjusted gross income and expanded income:						
Adjusted gross income	3,566,125	2,170,148,423	3,558,736	2,165,160,401	7,389	4,988,022
plus: Total tax preferences excluded from adjusted gross income	993,209	35,542,553	991,068	35,082,833	2,141	459,720
Social Security benefits (nontaxable)	581,497	1,903,174	579,768	1,897,642	1,729	5,533
Foreign-earned income exclusion	34,850	2,540,344	32,936	2,378,120	1,914	162,224
minus: Investment interest expense deduction	653,754	16,723,479	651,504	15,999,707	2,250	723,772
Non-limited miscellaneous deductions	206,438	9,470,528	204,807	8,766,295	1,631	704,233
Unreimbursed employee business expenses	647,473	6,092,841	646,921	6,085,853	552	6,988
Equals: Expanded income	3,565,995	2,177,847,646	3,558,736	2,173,667,141	7,259	4,180,505

Footnotes at end of table.

High-Income Tax Returns for 2005

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Table 5. Returns With and Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Income, Deductions, Credits, and Tax, by Tax Status, Tax Year 2005—Continued

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

Income concept, item	Returns with income of \$200,000 or more					
	Total		Returns with U.S. income tax		Returns without U.S. income tax	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
Expanded income concept						
Salaries and wages	3,019,178	914,246,010	3,012,785	912,399,614	6,393	1,846,396
Business or profession:						
Net income	711,966	84,467,935	710,600	84,306,164	1,366	161,771
Net loss	221,580	5,848,511	220,868	5,766,515	712	81,995
Farm:						
Net income	26,049	1,440,234	26,008	1,438,047	41	2,187
Net loss	78,980	3,353,295	78,778	3,321,008	202	32,286
Partnership and S Corporation net income after Section 179 property deduction [1]:						
Net income	1,251,372	397,684,591	1,249,464	397,247,154	1,908	437,437
Net loss	378,790	34,138,015	376,911	33,419,263	1,879	718,752
Sales of capital assets:						
Net gain	1,864,369	558,415,476	1,860,210	557,014,877	4,159	1,400,600
Net loss	970,899	2,489,001	966,698	2,477,425	4,201	11,576
Sales of property other than capital assets:						
Net gain	197,355	6,297,277	196,787	6,273,836	568	23,441
Net loss	211,440	2,786,457	210,823	2,756,080	617	30,377
Taxable interest received	3,422,645	71,965,391	3,412,926	71,237,942	9,719	727,448
Tax-exempt interest	1,037,910	38,802,496	1,032,964	37,437,148	4,945	1,365,348
Dividends	2,833,882	93,189,249	2,825,443	92,357,454	8,438	831,795
Qualified dividends	2,613,909	72,567,669	2,606,626	71,939,678	7,283	627,992
Pensions and annuities in adjusted gross income	738,980	29,631,702	737,008	29,541,128	1,972	90,574
Rent:						
Net income	475,086	22,287,651	473,997	22,236,876	1,089	50,775
Net loss, total (deductible and nondeductible)	476,201	9,251,184	474,758	9,200,244	1,443	50,940
Nondeductible rental loss	274,016	4,241,276	273,123	4,216,856	893	24,421
Royalty:						
Net income	217,519	9,819,583	216,656	9,765,170	863	54,413
Net loss	6,711	95,557	6,684	94,102	27	1,456
Estate or trust:						
Net income	94,717	13,285,155	94,225	13,251,759	492	33,396
Net loss	11,487	956,525	11,389	938,071	98	18,454
State income tax refunds	1,240,223	6,202,794	1,238,480	6,175,478	1,743	27,316
Alimony received	7,186	1,255,015	7,177	1,254,012	9	1,003
Social Security benefits in adjusted gross income	626,549	11,648,147	623,540	11,594,067	3,009	54,080
Social Security benefits (nontaxable)	626,565	2,055,912	623,547	2,046,261	3,018	9,651
Unemployment compensation	68,887	381,741	68,794	381,304	93	437
Other income	519,131	16,103,778	517,617	16,007,696	1,513	96,081
Other loss	49,364	2,254,727	47,969	2,202,502	1,395	52,225
Foreign-earned income exclusion	52,761	4,132,004	48,854	3,775,855	3,907	356,149
Total income	3,584,012	2,195,532,733	3,573,331	2,191,023,460	10,680	4,509,273
Statutory adjustments, total	1,568,726	28,753,624	1,566,049	28,714,857	2,677	38,767
Payments to Individual Retirement Arrangements	140,652	952,029	140,366	950,424	286	1,605
Payments to self-employed retirement (Keogh) plans	388,655	11,608,797	388,392	11,601,819	263	6,978
Moving expenses adjustment	36,806	273,375	36,685	272,410	121	965
Adjusted gross income	3,584,012	2,166,779,109	3,573,331	2,162,308,603	10,680	4,470,506
Investment interest expense deduction	648,489	15,938,552	646,214	15,617,185	2,275	321,367
Total tax preferences excluded from adjusted gross income	1,053,114	41,764,719	1,048,170	40,395,806	4,944	1,368,913
Total alternative minimum tax preference items (excluding tax-exempt interest from private activity bonds)	28,260	2,978,317	28,211	2,973,061	49	5,256
Passive activity loss (alternative minimum tax adjustment)	603,543	8,632	602,345	8,194	1,198	439
Expanded income	3,584,012	2,188,920,324	3,573,331	2,183,068,501	10,680	5,851,824

Footnotes at end of table.

High-Income Tax Returns for 2005

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Table 5. Returns With and Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Income, Deductions, Credits, and Tax, by Tax Status, Tax Year 2005—Continued

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

Income concept, item	Returns with income of \$200,000 or more					
	Total		Returns with U.S. income tax		Returns without U.S. income tax	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
Expanded income concept—continued						
Exemption amount	2,019,158	13,180,058	2,011,364	13,125,716	7,794	54,343
Itemized deductions:						
Total per adjusted gross income concept	3,339,608	260,359,256	3,331,750	257,451,783	7,858	2,907,473
Total per expanded income concept	3,339,380	279,645,779	3,331,550	277,010,875	7,830	2,634,904
Charitable contributions deduction	3,197,036	76,420,771	3,190,370	75,074,539	6,665	1,346,232
Interest paid deduction:						
Total per adjusted gross income concept	2,795,488	67,846,007	2,790,268	67,394,699	5,220	451,308
Total per expanded income concept	2,648,694	51,907,455	2,644,395	51,777,514	4,298	129,941
Total home mortgage interest	2,643,621	51,674,758	2,639,338	51,545,331	4,283	129,427
Medical and dental expense deduction	83,153	2,397,290	80,683	2,154,973	2,470	242,317
Net casualty or theft loss deduction	61,943	2,203,457	60,900	1,754,062	1,043	449,394
Taxes paid deduction	3,335,043	139,398,945	3,327,670	139,074,082	7,373	324,863
Net limited miscellaneous deductions per adjusted gross income	509,593	10,172,704	506,195	10,027,665	3,397	145,039
Non-limited miscellaneous deductions	183,897	5,076,427	183,248	5,054,700	649	21,727
Excess of exemptions and deductions over adjusted gross income	8,132	1,307,730	3,194	680,034	4,937	627,695
Taxable income	3,575,839	1,892,267,169	3,570,145	1,890,154,633	5,694	2,112,536
Tax at regular rates	3,575,856	475,707,506	3,570,157	475,188,022	5,699	519,484
Alternative minimum tax (Form 6251)	2,198,240	14,098,686	2,198,102	14,098,377	138	308
Income tax before credits	3,579,083	489,817,958	3,573,331	489,298,166	5,752	519,792
Tax credits:						
Total	1,482,141	10,302,330	1,476,388	9,782,538	5,752	519,792
Child care credit	221,091	119,838	220,965	119,797	126	41
Minimum tax credit	116,280	849,466	115,606	826,831	674	22,636
Foreign tax credit	1,214,884	8,498,615	1,209,628	8,003,404	5,256	495,211
General business credit	73,480	652,123	73,347	651,287	133	836
U.S. total income tax	3,573,331	479,515,990	3,573,331	479,515,990	0	0
Taxable income which would yield:						
Income tax before credits	3,579,083	1,635,013,410	3,573,331	1,633,234,206	5,752	1,779,204
Income tax after credits	3,573,329	1,603,901,299	3,573,329	1,603,901,299	0	0
U.S. total income tax	3,573,331	1,603,902,358	3,573,331	1,603,902,358	0	0
Reconciliation of adjusted gross income and expanded income:						
Adjusted gross income	3,584,012	2,166,779,109	3,573,331	2,162,308,603	10,680	4,470,506
plus: Total tax preferences excluded from adjusted gross income	1,053,114	41,764,719	1,048,170	40,395,806	4,944	1,368,913
Social Security benefits (nontaxable)	626,565	2,055,912	623,547	2,046,261	3,018	9,651
Foreign-earned income exclusion	52,761	4,132,004	48,854	3,775,855	3,907	356,149
minus: Investment interest expense deduction	648,489	15,938,552	646,214	15,617,185	2,275	321,367
Non-limited miscellaneous deductions	183,897	5,076,427	183,248	5,054,700	649	21,727
Unreimbursed employee business expenses	605,448	4,785,450	604,811	4,781,459	637	3,991
Equals: Expanded income	3,584,012	2,188,920,324	3,573,331	2,183,068,501	10,680	5,851,824

[1] Section 179 of the Internal Revenue Code permits certain taxpayers to elect to deduct all or part of the cost of certain qualifying property in the year they place it in service, instead of taking depreciation deductions over a specified recovery period.

[2] Includes tax-exempt interest and tax preference items subject to alternative minimum tax.

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

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Table 6. Returns With and Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Income, Deductions, Credits, and Tax, by Tax Status, Tax Year 2004

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

Income concept, item	Returns with income of \$200,000 or more					
	Total		Returns with worldwide income tax		Returns without worldwide income tax	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
Adjusted gross income concept						
Salaries and wages	3,037,602	917,754,477	3,035,552	917,415,015	2,050	339,461
Business or profession:						
Net income	711,757	84,176,298	710,999	84,113,489	758	62,809
Net loss	225,010	5,914,517	224,509	5,848,710	501	65,807
Farm:						
Net income	25,943	1,440,185	25,915	1,438,398	28	1,787
Net loss	77,794	3,329,303	77,665	3,303,717	129	25,586
Partnership and S corporation net income after section 179 property deduction [1]:						
Net income	1,246,960	397,841,799	1,245,818	397,648,741	1,142	193,058
Net loss	375,955	34,552,297	374,842	33,723,515	1,113	828,782
Sales of capital assets:						
Net gain	1,835,002	557,831,935	1,833,025	556,721,065	1,977	1,110,870
Net loss	962,873	2,461,233	961,563	2,457,578	1,310	3,656
Sales of property other than capital assets:						
Net gain	194,327	6,253,352	193,948	6,234,162	379	19,189
Net loss	211,463	2,814,355	211,081	2,777,077	382	37,278
Taxable interest received	3,399,578	71,302,458	3,395,835	70,435,477	3,743	866,980
Tax-exempt interest	978,981	32,690,464	977,390	32,273,229	1,591	417,235
Dividends	2,792,525	91,015,212	2,789,441	90,526,871	3,084	488,342
Qualified dividends	2,574,956	70,899,940	2,572,134	70,513,088	2,822	386,852
Pensions and annuities in adjusted gross income	722,297	29,022,912	721,240	28,962,552	1,057	60,360
Rent:						
Net income	471,190	22,088,356	470,553	22,051,312	637	37,044
Net loss, total (deductible and nondeductible)	478,148	9,454,651	477,494	9,400,526	654	54,125
Nondeductible rental loss	275,998	4,333,502	275,599	4,318,346	399	15,156
Royalty:						
Net income	211,903	9,735,263	211,454	9,701,314	449	33,950
Net loss	6,371	92,243	6,353	91,559	18	684
Estate or trust:						
Net income	90,448	13,224,453	90,211	13,199,895	237	24,558
Net loss	11,458	963,278	11,408	950,312	50	12,966
State income tax refunds	1,246,228	6,201,745	1,245,176	6,182,107	1,052	19,638
Alimony received	7,179	1,254,454	7,172	1,253,847	7	606
Social Security benefits in adjusted gross income	581,486	10,782,907	580,011	10,755,794	1,475	27,112
Social Security benefits (nontaxable)	581,497	1,903,174	580,022	1,898,390	1,475	4,785
Unemployment compensation	72,021	396,185	71,934	395,854	87	332
Other income	517,882	16,105,911	517,056	16,065,842	826	40,068
Other loss	38,455	1,873,114	38,411	1,871,771	44	1,343
Foreign-earned income exclusion	34,850	2,540,344	34,840	2,539,677	10	667
Total income	3,566,125	2,198,789,963	3,561,901	2,195,958,963	4,224	2,831,000
Statutory adjustments, total	1,569,936	28,641,540	1,568,395	28,620,481	1,541	21,058
Payments to Individual Retirement Arrangements	140,860	959,748	140,769	959,228	91	520
Payments to self-employed retirement (Keogh) plans	386,912	11,529,427	386,749	11,524,967	163	4,461
Moving expenses adjustment	35,694	264,022	35,671	263,791	23	230
Adjusted gross income	3,566,125	2,170,148,423	3,561,901	2,167,338,482	4,224	2,809,942
Investment interest expense deduction	653,754	16,723,479	652,142	16,052,657	1,612	670,822
Total tax preferences excluded from adjusted gross income	993,209	35,542,553	991,618	35,124,988	1,591	417,565
Total alternative minimum tax preference items (excluding tax-exempt interest from private activity bonds)	26,895	2,868,205	26,877	2,866,808	18	1,397
Passive activity loss (alternative minimum tax adjustment)	594,744	5,920	594,173	5,456	571	464
Expanded income	3,565,995	2,177,847,646	3,561,901	2,175,990,237	4,094	1,857,410

Footnotes at end of table.

High-Income Tax Returns for 2005

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Table 6. Returns With and Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Income, Deductions, Credits, and Tax, by Tax Status, Tax Year 2004—Continued

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

Income concept, item	Returns with income of \$200,000 or more					
	Total		Returns with worldwide income tax		Returns without worldwide income tax	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
Adjusted gross income concept—continued						
Exemption amount	1,995,412	13,139,518	1,993,177	13,127,019	2,235	12,499
Itemized deductions:						
Total per adjusted gross income concept	3,338,816	266,425,646	3,334,605	262,945,915	4,211	3,479,731
Charitable contributions deduction	3,197,215	76,123,864	3,193,729	74,987,801	3,486	1,136,064
Interest paid deduction:						
Total per adjusted gross income concept	2,825,656	69,373,134	2,822,588	68,606,569	3,068	766,566
Total home mortgage interest	2,679,860	52,409,221	2,677,310	52,314,369	2,550	94,852
Medical and dental expense deduction	69,752	2,070,082	69,074	1,941,392	678	128,689
Net casualty or theft loss deduction	61,196	2,224,553	60,243	1,771,715	953	452,838
Taxes paid deduction	3,334,579	139,413,292	3,330,476	139,168,003	4,103	245,290
Net limited miscellaneous deductions per adjusted gross income concept	527,890	11,038,079	526,528	10,929,402	1,362	108,677
Nonlimited miscellaneous deductions	206,438	9,470,528	204,951	8,771,336	1,487	699,192
Excess of exemptions and deductions over adjusted gross income	6,473	2,051,743	2,712	1,299,818	3,761	751,925
Taxable income	3,559,568	1,890,509,931	3,559,189	1,890,440,407	379	69,524
Tax at regular rates	3,559,579	475,594,761	3,559,206	475,583,275	373	11,486
Alternative minimum tax (Form 6251).....	2,206,296	14,166,768	2,206,296	14,166,768	0	0
Income tax before credits	3,562,273	489,773,293	3,561,900	489,761,807	373	11,486
Tax credits:						
Total	416,998	1,797,784	416,625	1,786,297	373	11,486
Child care credit	225,594	122,198	225,573	122,190	21	8
Minimum tax credit	111,338	843,986	111,054	833,139	284	10,847
Foreign tax credit	0	0	0	0	0	0
General business credit	73,693	649,974	73,610	649,460	83	515
Worldwide income tax	3,561,901	488,733,862	3,561,901	488,733,862	0	0
Foreign taxes paid	1,173,002	8,974,845	1,173,002	8,974,845	0	0
Foreign taxes paid on excluded foreign-earned income (Form 1116)	23,907	757,990	23,907	757,990	0	0
Taxable income which would yield:						
Income tax before credits	3,562,273	1,634,526,882	3,561,900	1,634,479,891	373	46,991
Income tax after credits	3,561,901	1,631,428,957	3,561,901	1,631,428,957	0	0
Worldwide income tax	3,561,901	1,631,429,991	3,561,901	1,631,429,991	0	0
Reconciliation of adjusted gross income and expanded income:						
Adjusted gross income	3,566,125	2,170,148,423	3,561,901	2,167,338,482	4,224	2,809,942
plus: Total tax preferences excluded from adjusted gross income [2]	993,209	35,542,553	991,618	35,124,988	1,591	417,565
Social Security benefits (nontaxable)	581,497	1,903,174	580,022	1,898,390	1,475	4,785
Foreign-earned income exclusion	34,850	2,540,344	34,840	2,539,677	10	667
minus: Investment interest expense deduction	653,754	16,723,479	652,142	16,052,657	1,612	670,822
Nonlimited miscellaneous deductions	206,438	9,470,528	204,951	8,771,336	1,487	699,192
Unreimbursed employee business expenses	647,473	6,092,841	647,103	6,087,306	370	5,534
Equals: Expanded income	3,565,995	2,177,847,646	3,561,901	2,175,990,237	4,094	1,857,410

Footnotes at end of table.

High-Income Tax Returns for 2005

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Table 6. Returns With and Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Income, Deductions, Credits, and Tax, by Tax Status, Tax Year 2004—Continued

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

Income concept, item	Returns with income of \$200,000 or more					
	Total		Returns with worldwide income tax		Returns without worldwide income tax	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
Expanded income concept						
Salaries and wages	3,019,178	914,246,010	3,017,239	913,945,512	1,939	300,498
Business or profession:						
Net income	711,966	84,467,935	711,275	84,413,410	691	54,525
Net loss	221,580	5,848,511	221,115	5,791,421	465	57,090
Farm:						
Net income	26,049	1,440,234	26,024	1,438,963	25	1,271
Net loss	78,980	3,353,295	78,835	3,327,818	145	25,477
Partnership and S corporation net income after section 179 property deduction [1]:						
Net income	1,251,372	397,684,591	1,250,034	397,506,292	1,338	178,299
Net loss	378,790	34,138,015	377,390	33,502,133	1,400	635,882
Sales of capital assets:						
Net gain	1,864,369	558,415,476	1,861,860	557,541,079	2,509	874,397
Net loss	970,899	2,489,001	968,401	2,481,912	2,498	7,089
Sales of property other than capital assets:						
Net gain	197,355	6,297,277	196,927	6,280,302	428	16,975
Net loss	211,440	2,786,457	210,971	2,765,104	469	21,353
Taxable interest received	3,422,645	71,965,391	3,417,367	71,357,527	5,278	607,864
Tax-exempt interest	1,037,910	38,802,496	1,033,784	37,511,658	4,125	1,290,838
Dividends	2,833,882	93,189,249	2,829,009	92,648,503	4,872	540,746
Qualified dividends	2,613,909	72,567,669	2,609,454	72,150,106	4,455	417,564
Pensions and annuities in adjusted gross income	738,980	29,631,702	737,474	29,561,921	1,506	69,781
Rent:						
Net income	475,086	22,287,651	474,398	22,256,711	688	30,940
Net loss, total (deductible and nondeductible)	476,201	9,251,184	475,560	9,219,256	641	31,928
Nondeductible rental loss	274,016	4,241,276	273,677	4,227,054	339	14,222
Royalty:						
Net income	217,519	9,819,583	216,888	9,793,226	631	26,357
Net loss	6,711	95,557	6,689	95,324	22	234
Estate or trust:						
Net income	94,717	13,285,155	94,339	13,261,114	378	24,041
Net loss	11,487	956,525	11,412	941,098	75	15,427
State income tax refunds	1,240,223	6,202,794	1,238,992	6,181,378	1,231	21,416
Alimony received	7,186	1,255,015	7,179	1,254,247	7	767
Social Security benefits in adjusted gross income	626,549	11,648,147	623,876	11,599,418	2,673	48,729
Social Security benefits (nontaxable)	626,565	2,055,912	623,891	2,047,312	2,674	8,600
Unemployment compensation	68,887	381,741	68,819	381,501	68	240
Other income	519,131	16,103,778	518,175	16,071,785	955	31,993
Other loss	49,364	2,254,727	49,307	2,252,160	57	2,567
Foreign-earned income exclusion	52,761	4,132,004	52,718	4,126,370	43	5,634
Total income	3,584,012	2,195,532,733	3,578,591	2,193,493,867	5,420	2,038,866
Statutory adjustments, total	1,568,726	28,753,624	1,567,114	28,732,905	1,612	20,719
Payments to Individual Retirement Arrangements	140,652	952,029	140,543	951,422	109	607
Payments to self-employed retirement (Keogh) plans	388,655	11,608,797	388,480	11,604,274	175	4,523
Moving expenses adjustment	36,806	273,375	36,785	273,138	21	238
Adjusted gross income	3,584,012	2,166,779,109	3,578,591	2,164,760,963	5,420	2,018,147
Investment interest expense deduction	648,489	15,938,552	646,946	15,654,905	1,543	283,647
Total tax preferences excluded from adjusted gross income	1,053,114	41,764,719	1,048,988	40,473,263	4,126	1,291,456
Total alternative minimum tax preference items (excluding tax-exempt interest from private activity bonds)	28,260	2,978,317	28,234	2,976,592	26	1,724
Passive activity loss (alternative minimum tax adjustment)	603,543	10,253	602,784	9,443	759	810
Expanded income	3,584,012	2,188,920,324	3,578,591	2,185,906,625	5,420	3,013,699

Footnotes at end of table.

High-Income Tax Returns for 2005

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Table 6. Returns With and Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Income, Deductions, Credits, and Tax, by Tax Status, Tax Year 2004—Continued

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

Income concept, item	Returns with income of \$200,000 or more					
	Total		Returns with worldwide income tax		Returns without worldwide income tax	
	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
Expanded income concept—continued						
Exemption amount	2,019,158	13,180,058	2,014,888	13,153,183	4,270	26,875
Itemized deductions:						
Total per adjusted gross income concept	3,339,608	260,359,256	3,334,529	257,813,399	5,079	2,545,857
Total per expanded income concept	3,339,380	279,645,779	3,334,301	277,360,687	5,079	2,285,092
Charitable contributions deduction	3,197,036	76,420,771	3,192,423	75,280,233	4,613	1,140,539
Interest paid deduction:						
Total per adjusted gross income concept	2,795,488	67,846,007	2,792,515	67,479,860	2,973	366,147
Total per expanded income concept	2,648,694	51,907,455	2,646,368	51,824,955	2,326	82,500
Total home mortgage interest	2,643,621	51,674,758	2,641,306	51,592,631	2,315	82,126
Medical and dental expense deduction	83,153	2,397,290	80,891	2,161,028	2,262	236,261
Net casualty or theft loss deduction	61,943	2,203,457	60,949	1,758,354	994	445,103
Taxes paid deduction	3,335,043	139,398,945	3,329,995	139,142,692	5,048	256,253
Net limited miscellaneous deductions per adjusted gross income concept	509,593	10,172,704	506,842	10,046,777	2,751	125,927
Non-limited miscellaneous deductions	183,897	5,076,427	183,402	5,058,326	495	18,101
Excess of exemptions and deductions over adjusted gross income	8,132	1,307,730	3,203	680,416	4,928	627,314
Taxable income	3,575,839	1,892,267,169	3,575,396	1,892,197,437	443	69,732
Tax at regular rates	3,575,856	475,707,506	3,575,411	475,696,026	445	11,480
Alternative minimum tax (Form 6251)	2,198,240	14,098,686	2,198,181	14,098,642	59	44
Income tax before credits	3,579,083	489,817,958	3,578,587	489,806,433	496	11,524
Tax credits:						
Total	417,872	1,803,715	417,376	1,792,190	496	11,524
Child care credit	221,091	119,838	221,073	119,831	18	7
Minimum tax credit	116,280	849,466	115,986	838,689	294	10,777
Foreign tax credit	0	0	0	0	0	0
General business credit	73,480	652,123	73,404	651,625	76	498
Worldwide income tax	3,578,591	489,066,106	3,578,591	489,066,106	0	0
Foreign taxes paid	1,214,888	9,550,116	1,214,888	9,550,116	0	0
Foreign taxes paid on excluded foreign-earned income (Form 1116)	34,672	1,051,501	34,672	1,051,501	0	0
Taxable income which would yield:						
Income tax before credits	3,579,083	1,635,013,410	3,578,587	1,634,965,822	496	47,588
Income tax after credits	3,578,591	1,632,861,916	3,578,591	1,632,861,916	0	0
Worldwide income tax	3,578,591	1,632,862,950	3,578,591	1,632,862,950	0	0
Reconciliation of adjusted gross income and expanded income:						
Adjusted gross income	3,584,012	2,166,779,109	3,578,591	2,164,760,963	5,420	2,018,147
plus: Total tax preferences excluded from adjusted gross income [2]	1,053,114	41,764,719	1,048,988	40,473,263	4,126	1,291,456
Social Security benefits (nontaxable)	626,565	2,055,912	623,891	2,047,312	2,674	8,600
Foreign-earned income exclusion	52,761	4,132,004	52,718	4,126,370	43	5,634
minus: Investment interest expense deduction	648,489	15,938,552	646,946	15,654,905	1,543	283,647
Non-limited miscellaneous deductions	183,897	5,076,427	183,402	5,058,326	495	18,101
Unreimbursed employee business expenses	605,448	4,785,450	605,083	4,783,372	365	2,079
Equals: Expanded income	3,584,012	2,188,920,324	3,578,591	2,185,906,625	5,420	3,013,699

** Data combined to avoid disclosure of information for specific taxpayers.

[1] Section 179 of the Internal Revenue Code permits certain taxpayers to elect to deduct all or part of the cost of certain qualifying property in the year they place it in service, instead of taking depreciation deductions over a specified recovery period.

[2] Includes tax-exempt interest and tax preference items subject to alternative minimum tax.

NOTE: Detail may not add to totals due to rounding.

High-Income Tax Returns for 2005

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Table 7. Returns With and Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005

[All figures are estimates based on samples]

Tax status, item with the second largest tax effect	Total		Item with the largest tax effect					
			Interest paid deduction		Investment interest expense deduction [1]		Taxes paid deduction	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Returns with U.S. income tax								
Returns with adjusted gross income of \$200,000 or more								
Total	3,383,626	100.0	752,092	22.2	47,802	1.4	1,910,897	56.5
Interest paid deduction	1,291,173	38.2	0	0.0	10,396	21.7	1,118,882	58.6
Investment interest expense deduction [1]	72,320	2.1	13,842	1.8	0	0.0	39,648	2.1
Taxes paid deduction	1,078,640	31.9	667,960	88.8	24,743	51.8	0	0.0
Charitable contributions deduction	670,012	19.8	43,872	5.8	4,906	10.3	593,445	31.1
Medical and dental expense deduction	8,592	0.3	656	0.1	233	0.5	4,821	0.3
Net casualty or theft loss deduction	10,079	0.3	1,973	0.3	272	0.6	3,534	0.2
Total miscellaneous deductions	119,250	3.5	15,393	2.0	3,260	6.8	81,266	4.3
Foreign tax credit	18,999	0.6	151	[2]	182	0.4	15,052	0.8
General business credit	6,889	0.2	856	0.1	146	0.3	3,384	0.2
All other tax credits	14,484	0.4	851	0.1	485	[2]	7,997	0.4
Partnership and S corporation net losses	54,402	1.6	6,530	0.9	3,178	6.6	33,384	1.7
No second largest item	38,785	1.1	8	[2]	3	[2]	9,485	0.5
Returns with expanded income of \$200,000 or more								
Total	3,487,683	100.0	737,702	21.2	0	0.0	1,822,100	52.2
Interest paid deduction	1,307,387	37.5	0	0.0	0	0.0	1,095,706	60.1
Tax-exempt interest [3]	165,405	4.7	8,341	1.1	0	0.0	106,462	5.8
Taxes paid deduction	1,108,125	31.8	670,053	90.8	0	0.0	0	0.0
Charitable contributions deduction	584,258	16.8	45,340	6.1	0	0.0	492,572	27.0
Medical and dental expense deduction	12,054	0.3	656	0.1	0	0.0	4,334	0.2
Net casualty or theft loss deduction	9,799	0.3	1,969	0.3	0	0.0	3,398	0.2
Total miscellaneous deductions	49,075	1.4	1,733	0.2	0	0.0	25,066	1.4
Foreign tax credit	33,172	1.0	148	[2]	0	0.0	12,473	0.7
General business credit	6,964	0.2	875	0.1	0	0.0	2,936	0.2
All other tax credits	12,726	0.4	843	0.1	0	0.0	7,927	0.4
Partnership and S corporation net losses	52,463	1.5	6,765	0.9	0	0.0	28,303	1.6
Foreign-earned income exclusion [3]	28,277	0.8	0	0.0	0	0.0	613	[2]
AMT tax preference [3]	2,756	0.1	19	[2]	0	0.0	1,346	0.1
Nontaxable Social Security benefits [3]	77,216	2.2	951	0.1	0	0.0	32,707	1.8
No second largest item	38,006	1.1	8	[2]	0	0.0	8,257	0.5

Footnotes at end of table.

High-Income Tax Returns for 2005

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Table 7. Returns With and Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2004—Continued

[All figures are estimates based on samples]

Tax status, item with the second largest tax effect	Item with the largest tax effect—continued							
	Charitable contributions deduction		Medical and dental expense deduction		Net casualty or theft loss deduction		Total miscellaneous deductions	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
Returns with U.S. income tax								
Returns with adjusted gross income of \$200,000 or more								
Total	311,094	9.2	23,449	0.7	18,489	0.5	94,918	2.8
Interest paid deduction	62,666	20.1	1,778	7.6	4,863	26.3	23,083	24.3
Investment interest expense deduction [1]	6,492	2.1	383	1.6	359	1.9	2,322	2.4
Taxes paid deduction	219,151	70.4	14,707	62.7	10,238	55.4	55,296	58.3
Charitable contributions deduction	0	0.0	2,133	9.1	1,514	8.2	9,334	9.8
Medical and dental expense deduction	1,483	0.5	0	0.0	141	0.8	811	0.9
Net casualty or theft loss deduction	2,091	0.7	41	0.2	0	0.0	545	0.6
Total miscellaneous deductions	11,095	3.6	3,632	15.5	489	2.6	0	0.0
Foreign tax credit	718	0.2	140	0.6	18	0.1	255	0.3
General business credit	500	0.2	0	0.0	640	3.5	190	0.2
All other tax credits	655	0.2	8	[2]	10	0.1	176	0.2
Partnership and S corporation net losses	6,151	2.0	626	2.7	214	1.2	2,754	2.9
No second largest item	91	[2]	0	0.0	3	[2]	151	0.2
Returns with expanded income of \$200,000 or more								
Total	297,961	8.5	23,227	0.7	17,211	0.5	17,586	0.5
Interest paid deduction	63,853	21.4	2,173	9.4	4,355	25.3	2,170	12.3
Tax-exempt interest [3]	20,236	6.8	3,188	13.7	1,478	8.6	1,437	8.2
Taxes paid deduction	195,934	65.8	10,592	45.6	8,629	50.1	10,763	61.2
Charitable contributions deduction	0	0.0	2,168	9.3	1,590	9.2	1,932	11.0
Medical and dental expense deduction	1,155	0.4	0	0.0	141	0.8	185	1.1
Net casualty or theft loss deduction	1,467	0.5	41	0.2	0	0.0	124	0.7
Total miscellaneous deductions	5,248	1.8	2,233	9.6	49	0.3	0	0.0
Foreign tax credit	463	0.2	436	1.9	17	0.1	179	1.0
General business credit	503	0.2	0	0.0	640	3.7	0	0.0
All other tax credits	696	0.2	0	0.0	6	[2]	0	0.0
Partnership and S corporation net losses	5,254	1.8	604	2.6	194	1.1	**650	**3.7
Foreign-earned income exclusion [3]	60	[2]	0	0.0	0	0.0	**	**
AMT tax preference [3]	181	0.1	0	0.0	0	0.0	**4	[2]
Nontaxable Social Security benefits [3]	2,864	1.0	1,793	7.7	107	0.6	**	**
No second largest item	47	[2]	0	0.0	3	[2]	141	0.8

Footnotes at end of table.

High-Income Tax Returns for 2005

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Table 7. Returns With and Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005—Continued

[All figures are estimates based on samples]

Tax status, item with the second largest tax effect	Item with the largest tax effect—continued							
	Foreign tax credit		General business credit		All other tax credits		Partnership and S corporation net losses	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
Returns with U.S. income tax								
Returns with adjusted gross income of \$200,000 or more								
Total	67,835	2.0	9,665	0.3	23,389	0.7	123,996	3.7
Interest paid deduction	14,796	21.8	2,667	27.6	5,916	25.3	46,127	37.2
Investment interest expense deduction [1]	1,133	1.7	401	4.1	553	2.4	7,187	5.8
Taxes paid deduction	21,388	31.5	3,649	37.8	9,788	41.8	51,719	41.7
Charitable contributions deduction	2,374	3.5	827	8.6	1,051	4.5	10,557	8.5
Medical and dental expense deduction	226	0.3	0	0.0	0	0.0	222	0.2
Net casualty or theft loss deduction	525	0.8	503	5.2	44	0.2	551	0.4
Total miscellaneous deductions	1,247	1.8	37	0.4	32	0.1	2,799	2.3
Foreign tax credit	0	0.0	428	4.4	761	3.3	1,295	1.0
General business credit	389	0.6	0	0.0	195	0.8	589	0.5
All other tax credits	3,586	5.3	151	1.6	0	0.0	564	0.5
Partnership and S corporation net losses	1,401	2.1	47	0.5	118	0.5	0	0.0
No second largest item	20,770	30.6	954	9.9	4,932	21.1	2,387	1.9
Returns with expanded income of \$200,000 or more								
Total	60,668	1.7	9,328	0.3	22,803	0.7	116,907	3.4
Interest paid deduction	4,553	7.5	2,204	23.6	4,943	21.7	34,741	29.7
Tax-exempt interest [3]	2,199	3.6	737	7.9	1,944	8.5	8,817	7.5
Taxes paid deduction	14,855	24.5	3,590	38.5	9,554	41.9	49,053	42.0
Charitable contributions deduction	571	0.9	848	9.1	1,072	4.7	10,302	8.8
Medical and dental expense deduction	45	0.1	3	[2]	0	0.0	222	0.2
Net casualty or theft loss deduction	524	0.9	498	5.3	3	[2]	455	0.4
Total miscellaneous deductions	495	0.8	**	**	**10	[2]	**1,872	**1.6
Foreign tax credit	0	0.0	**271	**2.9	**713	**3.1	**514	**0.4
General business credit	233	0.4	0	0.0	181	0.8	578	0.5
All other tax credits	341	0.6	138	1.5	0	0.0	691	0.6
Partnership and S corporation net losses	**842	**1.4	**	**	**151	**0.7	0	0.0
Foreign-earned income exclusion [3]	**27,512	**45.3	0	0.0	**8	[2]	**66	0.1
AMT tax preference [3]	**144	**0.2	4	[2]	**105	**0.5	268	0.2
Nontaxable Social Security benefits [3]	**780	**1.3	426	4.6	**207	**0.9	**7,730	**6.6
No second largest item	7,574	12.5	608	6.5	3,911	17.2	**1,598	**1.4

Footnotes at end of table.

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Table 7. Returns With and Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005—Continued

[All figures are estimates based on samples]

Tax status, item with the second largest tax effect	Item with the largest tax effect—continued							
	Foreign-earned income exclusion [3]		Tax-exempt interest [3]		AMT tax preference [3]		Nontaxable Social Security benefits [3]	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
Returns with U.S. income tax								
Returns with adjusted gross income of \$200,000 or more								
Total	0	0.0	0	0.0	0	0.0	0	0.0
Interest paid deduction	0	0.0	0	0.0	0	0.0	0	0.0
Investment interest expense deduction [1]	0	0.0	0	0.0	0	0.0	0	0.0
Taxes paid deduction	0	0.0	0	0.0	0	0.0	0	0.0
Charitable contributions deduction	0	0.0	0	0.0	0	0.0	0	0.0
Medical and dental expense deduction	0	0.0	0	0.0	0	0.0	0	0.0
Net casualty or theft loss deduction	0	0.0	0	0.0	0	0.0	0	0.0
Total miscellaneous deductions	0	0.0	0	0.0	0	0.0	0	0.0
Foreign tax credit	0	0.0	0	0.0	0	0.0	0	0.0
General business credit	0	0.0	0	0.0	0	0.0	0	0.0
All other tax credits	0	0.0	0	0.0	0	0.0	0	0.0
Partnership and S corporation net losses	0	0.0	0	0.0	0	0.0	0	0.0
No second largest item	0	0.0	0	0.0	0	0.0	0	0.0
Returns with expanded income of \$200,000 or more								
Total	17,855	0.6	221,359	7.4	17,855	0.6	68,956	2.3
Interest paid deduction	4,176	23.4	24,695	11.2	3,717	20.8	35,203	51.1
Tax-exempt interest [3]	578	3.2	0	0.0	633	3.5	9,952	14.4
Taxes paid deduction	**	**	** 109,368	** 49.4	11,643	65.2	9,617	13.9
Charitable contributions deduction	** 375	** 2.1	28,090	12.7	800	4.5	6	[2]
Medical and dental expense deduction	0	0.0	3,695	1.7	41	0.2	356	0.5
Net casualty or theft loss deduction	0	0.0	144	0.1	3	[2]	0	0.0
Total miscellaneous deductions	**	**	** 11,033	** 5.0	5	[2]	0	0.0
Foreign tax credit	** 12,186	** 68.2	** 768	** 0.3	91	0.5	1,934	2.8
General business credit	0	0.0	730	0.3	3	[2]	43	0.1
All other tax credits	0	0.0	802	0.4	85	0.5	131	0.2
Partnership and S corporation net losses	70	0.4	7,551	3.4	789	4.4	1,934	2.8
Foreign-earned income exclusion [3]	0	0.0	5	[2]	0	0.0	0	0.0
AMT tax preference [3]	0	0.0	200	0.1	0	0.0	158	0.2
Nontaxable Social Security benefits [3]	0	0.0	28,855	13.0	21	0.1	0	0.0
No second largest item	470	2.6	5,423	2.5	25	0.1	9,623	14.0

Footnotes at end of table.

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Table 7. Returns With and Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005—Continued

[All figures are estimates based on samples]

Tax status, item with the second largest tax effect	Total		Item with the largest tax effect					
			Interest paid deduction		Investment interest expense deduction [1]		Taxes paid deduction	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Returns without U.S. income tax								
Returns with adjusted gross income of \$200,000 or more								
Total	7,389	100.0	95	1.3	519	7.0	85	1.2
Interest paid deduction	1,935	26.2	0	0.0	89	17.1	12	14.1
Investment interest expense deduction [1]	413	5.6	12	12.6	0	0.0	11	12.9
Taxes paid deduction	1,824	24.7	39	41.1	95	18.3	0	0.0
Charitable contributions deduction	785	10.6	18	18.9	101	19.5	27	31.8
Medical and dental expense deduction	127	1.7	4	4.2	14	2.7	**3	3.5
Net casualty or theft loss deduction	57	0.8	3	3.2	3	0.6	0	0.0
Total miscellaneous deductions	461	6.2	6	6.3	54	10.4	10	11.8
Foreign tax credit	100	1.4	**	**	21	4.0	8	9.4
General business credit	27	0.4	**	**	**	**	**	**
All other tax credits	129	1.7	**9	**9.5	**10	**1.9	**	**
Partnership and S corporation net losses	532	7.2	4	4.2	132	25.4	11	12.9
No second largest item	999	13.5	**	**	**	**	**3	**3.5
Returns with expanded income of \$200,000 or more								
Total	10,680	100.0	85	0.8	0	0.0	102	1.0
Interest paid deduction	1,031	9.7	0	0.0	0	0.0	13	12.7
Tax-exempt interest [3]	1,025	9.6	6	7.1	0	0.0	29	28.4
Taxes paid deduction	1,719	16.1	34	40.0	0	0.0	0	0.0
Charitable contributions deduction	945	8.8	19	22.4	0	0.0	22	21.6
Medical and dental expense deduction	631	5.9	3	3.5	0	0.0	5	4.9
Net casualty or theft loss deduction	59	0.6	3	3.5	0	0.0	0	0.0
Total miscellaneous deductions	407	3.8	**	**	0	0.0	**8	**7.8
Foreign tax credit	1,060	9.9	3	3.5	0	0.0	5	4.9
General business credit	29	0.3	3	3.5	0	0.0	0	0.0
All other tax credits	87	0.8	**	**	0	0.0	4	3.9
Partnership and S corporation net losses	534	5.0	**6	**7.1	0	0.0	**11	**10.8
Foreign-earned income exclusion [3]	2,770	25.9	4	4.7	0	0.0	5	4.9
AMT tax preference [3]	10	0.1	0	0.0	0	0.0	0	0.0
Nontaxable Social Security benefits [3]	145	1.4	4	4.7	0	0.0	0	0.0
No second largest item	228	2.1	0	0.0	0	0.0	**	**

Footnotes at end of table.

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Table 7. Returns With and Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005—Continued

[All figures are estimates based on samples]

Tax status, item with the second largest tax effect	Item with the largest tax effect—continued							
	Charitable contributions deduction		Medical and dental expense deduction		Net casualty or theft loss deduction		Total miscellaneous deductions	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
Returns without U.S. income tax								
Returns with adjusted gross income of \$200,000 or more								
Total	962	13.0	412	5.6	877	11.9	1,127	15.3
Interest paid deduction	94	9.8	19	4.6	302	34.4	399	35.4
Investment interest expense deduction [1]	102	10.6	16	3.9	30	3.4	21	1.9
Taxes paid deduction	413	42.9	127	30.8	343	39.1	369	32.7
Charitable contributions deduction	0	0.0	127	30.8	91	10.4	70	6.2
Medical and dental expense deduction	64	6.7	0	0.0	15	1.7	19	1.7
Net casualty or theft loss deduction	4	0.4	4	1.0	0	0.0	32	2.8
Total miscellaneous deductions	146	15.2	109	26.5	48	5.5	0	0.0
Foreign tax credit	39	4.1	**	**	4	0.5	7	0.6
General business credit	7	0.7	**	**	6	0.7	**	**
All other tax credits	18	1.9	**3	**0.7	**	**	**8	**0.7
Partnership and S corporation net losses	75	7.8	7	1.7	**38	**4.3	**132	**11.7
No second largest item	0	0.0	0	0.0	**	**	**70	**6.2
Returns with expanded income of \$200,000 or more								
Total	970	9.1	698	6.5	875	8.2	48	0.4
Interest paid deduction	96	9.9	19	2.7	296	33.8	5	10.4
Tax-exempt interest [3]	335	34.5	372	53.3	85	9.7	9	18.8
Taxes paid deduction	269	27.7	81	11.6	325	37.1	**	**
Charitable contributions deduction	0	0.0	118	16.9	76	8.7	**19	**39.6
Medical and dental expense deduction	54	5.6	0	0.0	14	1.6	**	**
Net casualty or theft loss deduction	4	0.4	4	0.6	0	0.0	0	0.0
Total miscellaneous deductions	86	8.9	71	10.2	9	1.0	0	0.0
Foreign tax credit	30	3.1	0	0.0	3	0.3	**	**
General business credit	5	0.5	**	**	**7	**0.8	0	0.0
All other tax credits	16	1.6	0	0.0	**	**	0	0.0
Partnership and S corporation net losses	65	6.7	6	0.9	35	4.0	**15	**31.3
Foreign-earned income exclusion [3]	5	0.5	0	0.0	6	0.7	0	0.0
AMT tax preference [3]	**	**	0	0.0	**3	**0.3	0	0.0
Nontaxable Social Security benefits [3]	**5	**0.5	**27	**3.9	**16	**1.8	0	0.0
No second largest item	0	0.0	0	0.0	0	0.0	0	0.0

Footnotes at end of table.

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Table 7. Returns With and Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005—Continued

[All figures are estimates based on samples]

Tax status, item with the second largest tax effect	Item with the largest tax effect—continued							
	Foreign tax credit		General business credit		All other tax credits		Partnership and S corporation net losses	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
Returns without U.S. income tax								
Returns with adjusted gross income of \$200,000 or more								
Total	2,693	36.4	4	0.1	303	4.1	312	4.2
Interest paid deduction	**983	**36.5	**4	**100.0	**12	**4.0	**23	**7.4
Investment interest expense deduction [1]	85	3.2	0	0.0	23	7.6	113	36.2
Taxes paid deduction	281	10.4	**	**	**156	**51.5	**	**
Charitable contributions deduction	231	8.6	0	0.0	36	11.9	84	26.9
Medical and dental expense deduction	7	0.3	0	0.0	0	0.0	**	**
Net casualty or theft loss deduction	11	0.4	0	0.0	0	0.0	0	0.0
Total miscellaneous deductions	58	2.2	0	0.0	7	2.3	23	7.4
Foreign tax credit	0	0.0	0	0.0	0	0.0	20	6.4
General business credit	**	**	0	0.0	4	1.3	4	1.3
All other tax credits	**	**	0	0.0	**43	**14.2	45	14.4
Partnership and S corporation net losses	**113	**4.2	**	**	**22	**7.3	0	0.0
No second largest item	924	34.3	0	0.0	**	**	0	0.0
Returns with expanded income of \$200,000 or more								
Total	3,612	33.8	5	[2]	303	2.8	302	2.8
Interest paid deduction	223	6.2	5	100.0	100	33.0	9	3.0
Tax-exempt interest [3]	40	1.1	0	0.0	18	5.9	**127	**42.0
Taxes paid deduction	**178	**4.9	**	**	**107	**35.3	42	13.9
Charitable contributions deduction	107	3.0	0	0.0	**37	**12.2	77	25.5
Medical and dental expense deduction	**12	**0.3	0	0.0	0	0.0	0	0.0
Net casualty or theft loss deduction	8	0.2	0	0.0	0	0.0	0	0.0
Total miscellaneous deductions	22	0.6	0	0.0	5	1.6	**13	**4.3
Foreign tax credit	**	**	0	0.0	0	0.0	**19	**6.3
General business credit	**	**	0	0.0	4	1.3	**5	**1.7
All other tax credits	**16	**0.4	0	0.0	0	0.0	**6	**2.0
Partnership and S corporation net losses	**66	**1.8	**	**	**23	**7.6	0	0.0
Foreign-earned income exclusion [3]	**2,750	**76.1	0	0.0	0	0.0	**	**
AMT tax preference [3]	**	**	0	0.0	**3	**1.0	**4	**1.3
Nontaxable Social Security benefits [3]	37	1.0	0	0.0	6	2.0	0	0.0
No second largest item	**153	**4.2	0	0.0	0	0.0	0	0.0

Footnotes at end of table.

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Table 7. Returns With and Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005—Continued

[All figures are estimates based on samples]

Tax status, item with the second largest tax effect	Item with the largest tax effect—continued							
	Foreign-earned income exclusion [3]		Tax-exempt interest [3]		AMT tax preference [3]		Nontaxable Social Security benefits [3]	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
Returns without U.S. income tax								
Returns with adjusted gross income of \$200,000 or more								
Total	0	0.0	0	0.0	0	0.0	0	0.0
Interest paid deduction	0	0.0	0	0.0	0	0.0	0	0.0
Investment interest expense deduction [1]	0	0.0	0	0.0	0	0.0	0	0.0
Taxes paid deduction	0	0.0	0	0.0	0	0.0	0	0.0
Charitable contributions deduction	0	0.0	0	0.0	0	0.0	0	0.0
Medical and dental expense deduction	0	0.0	0	0.0	0	0.0	0	0.0
Net casualty or theft loss deduction	0	0.0	0	0.0	0	0.0	0	0.0
Total miscellaneous deductions	0	0.0	0	0.0	0	0.0	0	0.0
Foreign tax credit	0	0.0	0	0.0	0	0.0	0	0.0
General business credit	0	0.0	0	0.0	0	0.0	0	0.0
All other tax credits	0	0.0	0	0.0	0	0.0	0	0.0
Partnership and S corporation net losses	0	0.0	0	0.0	0	0.0	0	0.0
No second largest item	0	0.0	0	0.0	0	0.0	0	0.0
Returns with expanded income of \$200,000 or more								
Total	1,072	10.0	2,608	24.4	0	0.0	0	0.0
Interest paid deduction	46	4.3	219	8.4	0	0.0	0	0.0
Tax-exempt interest [3]	**4	**0.4	0	0.0	0	0.0	0	0.0
Taxes paid deduction	**33	**3.1	650	24.9	0	0.0	0	0.0
Charitable contributions deduction	**	**	470	18.0	0	0.0	0	0.0
Medical and dental expense deduction	**	**	543	20.8	0	0.0	0	0.0
Net casualty or theft loss deduction	0	0.0	40	1.5	0	0.0	0	0.0
Total miscellaneous deductions	**	**	193	7.4	0	0.0	0	0.0
Foreign tax credit	986	92.0	14	0.5	0	0.0	0	0.0
General business credit	0	0.0	**5	**0.2	0	0.0	0	0.0
All other tax credits	3	0.3	**42	**1.6	0	0.0	0	0.0
Partnership and S corporation net losses	0	0.0	307	11.8	0	0.0	0	0.0
Foreign-earned income exclusion [3]	0	0.0	**	**	0	0.0	0	0.0
AMT tax preference [3]	0	0.0	**	**	0	0.0	0	0.0
Nontaxable Social Security benefits [3]	0	0.0	50	1.9	0	0.0	0	0.0
No second largest item	0	0.0	75	2.9	0	0.0	0	0.0

** Data deleted to avoid disclosure of information for specific taxpayers. However, deleted data are included in the appropriate totals.

[1] Investment interest expense deduction only has an effect when using the adjusted gross income concept.

[2] Less than 0.05 percent.

[3] Tax-exempt interest, foreign-earned income exclusion, AMT tax preference, and nontaxable Social Security benefits only have an effect when using the expanded income concept.

NOTES: Detail may not add to totals due to rounding. Total columns do not include returns with no tax effect.

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Table 8. Returns With and Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005

[All figures are estimates based on samples]

Item with the second largest tax effect	Total		Item with the largest tax effect					
			Interest paid deduction		Investment interest expense deduction [1]		Taxes paid deduction	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Returns with worldwide income tax								
Returns with adjusted gross income of \$200,000 or more								
Total	3,358,426	100.0	761,129	22.7	49,095	1.5	1,932,586	57.5
Interest paid deduction	1,295,266	38.6	0	0.0	10,673	21.7	1,132,458	58.6
Investment interest expense deduction [1]	72,885	2.2	14,165	1.9	0	0.0	40,732	2.1
Taxes paid deduction	1,068,585	31.8	675,471	88.7	25,247	51.4	0	0.0
Charitable contributions deduction	684,984	20.4	44,294	5.8	5,243	10.7	609,264	31.5
Medical and dental expense deduction	8,560	0.3	660	0.1	235	0.5	4,904	0.3
Net casualty or theft loss deduction	9,651	0.3	1,974	0.3	276	0.6	3,620	0.2
Total miscellaneous deductions	120,672	3.6	15,966	2.1	3,351	6.8	82,977	4.3
General business credit	7,027	0.2	856	0.1	152	0.3	3,691	0.2
All other tax credits	11,849	0.4	1,040	0.1	529	1.1	8,530	0.4
Partnership and S corporation net losses	54,019	1.6	6,539	0.9	3,229	6.6	34,140	1.8
No second largest item	24,928	0.7	165	[2]	162	0.3	12,271	0.6
Returns with expanded income of \$200,000 or more								
Total	3,484,111	100.0	741,380	21.3	0	0.0	1,837,157	52.7
Interest paid deduction	1,330,122	38.2	0	0.0	0	0.0	1,106,511	60.2
Tax-exempt interest [3]	168,434	4.8	8,358	1.1	0	0.0	108,565	5.9
Taxes paid deduction	1,104,988	31.7	673,276	90.8	0	0.0	0	0.0
Charitable contributions deduction	595,392	17.1	45,373	6.1	0	0.0	501,313	27.3
Medical and dental expense deduction	12,368	0.4	657	0.1	0	0.0	4,375	0.2
Net casualty or theft loss deduction	9,376	0.3	1,970	0.3	0	0.0	3,482	0.2
Total miscellaneous deductions	50,054	1.4	2,072	0.3	0	0.0	25,794	1.4
General business credit	7,265	0.2	875	0.1	0	0.0	3,222	0.2
All other tax credits	18,513	0.5	885	0.1	0	0.0	8,118	0.4
Partnership and S corporation net losses	52,619	1.5	6,769	0.9	0	0.0	28,681	1.6
Foreign-earned income exclusion [3]	2,264	0.1	166	[2]	0	0.0	1,166	0.1
AMT tax preference [3]	3,077	0.1	19	[2]	0	0.0	1,365	0.1
Nontaxable Social Security benefits [3]	78,178	2.2	951	0.1	0	0.0	33,626	1.8
No second largest item	51,460	1.5	9	[2]	0	0.0	10,941	0.6

Footnotes at end of table.

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Table 8. Returns With and Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005—Continued

[All figures are estimates based on samples]

Item with the second largest tax effect	Item with the largest tax effect—continued							
	Charitable contributions deduction		Medical and dental expense deduction		Net casualty or theft loss deduction		Total miscellaneous deductions	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
Returns with worldwide income tax								
Returns with adjusted gross income of \$200,000 or more								
Total	313,823	9.3	23,696	0.7	19,038	0.6	96,240	2.9
Interest paid deduction	63,788	20.3	1,779	7.5	5,378	28.3	23,738	24.7
Investment interest expense deduction [1]	6,625	2.1	385	1.6	361	1.9	2,351	2.4
Taxes paid deduction	220,796	70.4	14,896	62.9	10,268	53.9	55,750	57.9
Charitable contributions deduction	0	0.0	2,281	9.6	1,528	8.0	9,753	10.1
Medical and dental expense deduction	1,584	0.5	0	0.0	142	0.7	811	0.8
Net casualty or theft loss deduction	2,091	0.7	41	0.2	0	0.0	546	0.6
Total miscellaneous deductions	11,283	3.6	3,675	15.5	491	2.6	0	0.0
General business credit	514	0.2	0	0.0	640	3.4	190	0.2
All other tax credits	810	0.3	9	[2]	11	[2]	178	[2]
Partnership and S corporation net losses	**6,205	**2.0	**629	**2.7	214	1.1	2,767	2.9
No second largest item	**127	**	**	**	4	[2]	155	[2]
Returns with expanded income of \$200,000 or more								
Total	298,764	8.6	23,293	0.7	17,755	0.5	18,114	0.5
Interest paid deduction	63,967	21.4	2,174	9.3	4,868	27.4	2,175	12.0
Tax-exempt interest [3]	20,523	6.9	3,201	13.7	1,480	8.3	1,442	8.0
Taxes paid deduction	196,463	65.8	11,030	47.4	8,657	48.8	10,841	59.9
Charitable contributions deduction	0	0.0	2,174	9.3	1,602	9.0	2,095	11.6
Medical and dental expense deduction	1,257	0.4	0	0.0	142	0.8	185	1.0
Net casualty or theft loss deduction	1,467	0.5	41	0.2	0	0.0	125	0.7
Total miscellaneous deductions	5,328	1.8	2,274	9.8	49	0.3	0	0.0
General business credit	514	0.2	0	0.0	640	3.6	0	0.0
All other tax credits	709	0.2	0	0.0	6	[2]	0	0.0
Partnership and S corporation net losses	5,285	1.8	605	2.6	194	1.1	663	3.7
Foreign-earned income exclusion [3]	134	[2]	0	0.0	6	[2]	299	1.7
AMT tax preference [3]	192	0.1	0	0.0	0	0.0	3	[2]
Nontaxable Social Security benefits [3]	2,874	1.0	1,794	7.7	107	0.6	143	0.8
No second largest item	52	[2]	0	0.0	3	[2]	141	0.8

Footnotes at end of table.

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Table 8. Returns With and Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005—Continued

[All figures are estimates based on samples]

Item with the second largest tax effect	Item with the largest tax effect—continued							
	General business credit		All other tax credits		Partnership and S corporation net losses		Foreign-earned income exclusion [3]	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
Returns with worldwide income tax								
Returns with adjusted gross income of \$200,000 or more								
Total	0	0.0	10,057	0.3	27,185	0.8	125,576	3.7
Interest paid deduction	0	0.0	2,759	27.4	7,757	28.5	46,937	37.4
Investment interest expense deduction [1]	0	0.0	406	4.0	612	2.3	7,248	5.8
Taxes paid deduction	0	0.0	3,782	37.6	9,876	36.3	52,499	41.8
Charitable contributions deduction	0	0.0	881	8.8	1,092	4.0	10,648	8.5
Medical and dental expense deduction	0	0.0	0	0.0	0	0.0	224	0.2
Net casualty or theft loss deduction	0	0.0	503	5.0	45	0.2	555	0.4
Total miscellaneous deductions	0	0.0	46	0.5	47	0.2	2,835	2.3
General business credit	0	0.0	0	0.0	381	1.4	604	0.5
All other tax credits	0	0.0	154	1.5	0	0.0	588	0.5
Partnership and S corporation net losses	0	0.0	89	0.9	208	0.8	0	0.0
No second largest item	0	0.0	1,437	14.3	7,167	26.4	3,440	2.7
Returns with expanded income of \$200,000 or more								
Total	9,564	0.3	23,292	0.7	117,892	3.4	49,484	1.4
Interest paid deduction	2,251	23.5	5,149	22.1	35,036	29.7	19,015	38.4
Tax-exempt interest [3]	750	7.8	1,986	8.5	8,897	7.5	2,673	5.4
Taxes paid deduction	3,711	38.8	9,662	41.5	49,812	42.3	7,236	14.6
Charitable contributions deduction	902	9.4	1,102	4.7	10,371	8.8	2,398	4.8
Medical and dental expense deduction	3	[2]	0	0.0	224	0.2	155	0.3
Net casualty or theft loss deduction	498	5.2	4	[2]	459	0.4	5	[2]
Total miscellaneous deductions	**	**	**16	**0.1	1,889	1.6	383	0.8
General business credit	0	0.0	326	1.4	578	0.5	42	0.1
All other tax credits	141	1.5	0	0.0	705	0.6	5,952	12.0
Partnership and S corporation net losses	**86	**0.9	**122	**0.5	0	0.0	566	1.1
Foreign-earned income exclusion [3]	0	0.0	74	0.3	108	0.1	0	0.0
AMT tax preference [3]	5	0.1	106	0.5	271	0.2	134	0.3
Nontaxable Social Security benefits [3]	425	4.4	222	1.0	7,733	6.6	92	0.2
No second largest item	792	8.3	4,525	19.4	1,809	1.5	10,831	21.9

Footnotes at end of table.

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Table 8. Returns With and Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005—Continued

[All figures are estimates based on samples]

Item with the second largest tax effect	Item with the largest tax effect—continued					
	Tax-exempt interest [3]		AMT tax preference [3]		Nontaxable Social Security benefits [3]	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(25)	(26)	(27)	(28)	(29)	(30)
Returns with worldwide income tax						
Returns with adjusted gross income of \$200,000 or more						
Total	0	0.0	0	0.0	0	0.0
Interest paid deduction	0	0.0	0	0.0	0	0.0
Investment interest expense deduction [1]	0	0.0	0	0.0	0	0.0
Taxes paid deduction	0	0.0	0	0.0	0	0.0
Charitable contributions deduction	0	0.0	0	0.0	0	0.0
Medical and dental expense deduction	0	0.0	0	0.0	0	0.0
Net casualty or theft loss deduction	0	0.0	0	0.0	0	0.0
Total miscellaneous deductions	0	0.0	0	0.0	0	0.0
General business credit	0	0.0	0	0.0	0	0.0
All other tax credits	0	0.0	0	0.0	0	0.0
Partnership and S corporation net losses	0	0.0	0	0.0	0	0.0
No second largest item	0	0.0	0	0.0	0	0.0
Returns with expanded income of \$200,000 or more						
Total	238,928	6.9	13,404	0.4	95,084	2.7
Interest paid deduction	29,504	12.3	2,069	15.4	57,405	60.4
Tax-exempt interest [3]	0	0.0	932	7.0	9,627	10.1
Taxes paid deduction	114,334	47.9	9,033	67.4	10,934	11.5
Charitable contributions deduction	27,407	11.5	478	3.6	177	0.2
Medical and dental expense deduction	5,229	2.2	0	0.0	141	0.1
Net casualty or theft loss deduction	1,276	0.5	41	0.3	8	[2]
Total miscellaneous deductions	12,234	5.1	13	0.1	0	0.0
General business credit	1,057	0.4	3	[2]	8	[2]
All other tax credits	1,650	0.7	177	1.3	170	0.2
Partnership and S corporation net losses	6,908	2.9	82	0.6	2,659	2.8
Foreign-earned income exclusion [3]	171	0.1	141	1.1	0	0.0
AMT tax preference [3]	640	0.3	0	0.0	341	0.4
Nontaxable Social Security benefits [3]	29,857	12.5	353	2.6	0	0.0
No second largest item	8,662	3.6	81	0.6	13,614	14.3

Footnotes at end of table.

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Table 8. Returns With and Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005—Continued

[All figures are estimates based on samples]

Item with the second largest tax effect	Total		Item with the largest tax effect—continued					
			Interest paid deduction		Investment interest expense deduction [1]		Taxes paid deduction	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Returns without worldwide income tax								
Returns with adjusted gross income of \$200,000 or more								
Total	4,224	100.0	86	2.0	444	10.5	65	1.5
Interest paid deduction	973	23.0	0	0.0	84	18.9	8	12.3
Investment interest expense deduction [1]	293	6.9	12	14.0	0	0.0	11	16.9
Taxes paid deduction	1,431	33.9	37	43.0	85	19.1	0	0.0
Charitable contributions deduction	498	11.8	16	18.6	90	20.3	24	36.9
Medical and dental expense deduction	116	2.7	4	4.7	13	2.9	**	**
Net casualty or theft loss deduction	44	1.0	3	3.5	**	**	**	**
Total miscellaneous deductions	359	8.5	6	7.0	**44	**9.9	**5	**7.7
General business credit	21	0.5	**	**	**	**	**4	**6.2
All other tax credits	23	0.5	**4	**4.7	**	**	**	**
Partnership and S corporation net losses	392	9.3	4	4.7	128	28.8	**9	**13.8
No second largest item	74	1.8	**	**	**	**	**4	**6.2
Returns with expanded income of \$200,000 or more								
Total	5,420	100.0	76	1.4	0	0.0	82	1.5
Interest paid deduction	708	13.1	0	0.0	0	0.0	9	11.0
Tax-exempt interest [3]	908	16.8	6	7.9	0	0.0	28	34.1
Taxes paid deduction	1,405	25.9	33	43.4	0	0.0	0	0.0
Charitable contributions deduction	721	13.3	**23	**30.3	0	0.0	**12	**14.6
Medical and dental expense deduction	605	11.2	3	3.9	0	0.0	5	6.1
Net casualty or theft loss deduction	49	0.9	3	3.9	0	0.0	0	0.0
Total miscellaneous deductions	342	6.3	**	**	0	0.0	**7	**8.5
General business credit	22	0.4	**	**	0	0.0	**3	**3.7
All other tax credits	40	0.7	**	**	0	0.0	**3	**3.7
Partnership and S corporation net losses	425	7.8	4	5.3	0	0.0	**11	**13.4
Foreign-earned income exclusion [3]	8	0.1	**	**	0	0.0	4	4.9
AMT tax preference [3]	4	0.1	0	0.0	0	0.0	0	0.0
Nontaxable Social Security benefits [3]	106	2.0	4	5.3	0	0.0	0	0.0
No second largest item	77	1.4	0	0.0	0	0.0	**	**

Footnotes at end of table.

High-Income Tax Returns for 2005

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Table 8. Returns With and Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005—Continued

[All figures are estimates based on samples]

Item with the second largest tax effect	Item with the largest tax effect—continued							
	Charitable contributions deduction		Medical and dental expense deduction		Net casualty or theft loss deduction		Total miscellaneous deductions	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
Returns without worldwide income tax								
Returns with adjusted gross income of \$200,000 or more								
Total	837	19.8	398	9.4	863	20.4	1,112	26.3
Interest paid deduction	88	10.5	18	4.5	302	35.0	399	35.9
Investment interest expense deduction [1]	92	11.0	14	3.5	29	3.4	20	1.8
Taxes paid deduction	380	45.4	124	31.2	340	39.4	367	33.0
Charitable contributions deduction	0	0.0	123	30.9	89	10.3	68	6.1
Medical and dental expense deduction	**64	**7.6	0	0.0	14	1.6	**17	**1.5
Net casualty or theft loss deduction	4	0.5	**5	**1.3	0	0.0	32	2.9
Total miscellaneous deductions	**130	**15.5	**114	**28.6	**40	**4.6	0	0.0
General business credit	3	0.4	0	0.0	**7	**0.8	**	**
All other tax credits	**11	**1.3	0	0.0	**	**	**8	**0.7
Partnership and S corporation net losses	**65	**7.8	**	**	**39	**4.5	**133	**12.0
No second largest item	0	0.0	0	0.0	3	0.3	**68	**6.1
Returns with expanded income of \$200,000 or more								
Total	844	15.6	680	12.5	862	15.9	38	0.7
Interest paid deduction	92	10.9	**18	**2.6	296	34.3	3	7.9
Tax-exempt interest [3]	303	35.9	360	52.9	83	9.6	8	21.1
Taxes paid deduction	248	29.4	80	11.8	324	37.6	6	15.8
Charitable contributions deduction	0	0.0	115	16.9	73	8.5	8	21.1
Medical and dental expense deduction	**51	**6.0	0	0.0	13	1.5	3	7.9
Net casualty or theft loss deduction	4	0.5	4	0.6	0	0.0	0	0.0
Total miscellaneous deductions	75	8.9	71	10.4	9	1.0	0	0.0
General business credit	**	**	**3	**0.4	6	0.7	0	0.0
All other tax credits	10	1.2	0	0.0	**	**	0	0.0
Partnership and S corporation net losses	**57	**6.8	**3	**0.4	**35	**4.1	10	26.3
Foreign-earned income exclusion [3]	0	0.0	0	0.0	**4	**0.5	0	0.0
AMT tax preference [3]	0	0.0	0	0.0	**	**	0	0.0
Nontaxable Social Security benefits [3]	4	0.5	26	3.8	**19	**2.2	0	0.0
No second largest item	0	0.0	0	0.0	0	0.0	0	0.0

Footnotes at end of table.

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Table 8. Returns With and Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005—Continued

[All figures are estimates based on samples]

Item with the second largest tax effect	Item with the largest tax effect—continued							
	General business credit		All other tax credits		Partnership and S corporation net losses		Foreign-earned income exclusion [3]	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
Returns without worldwide income tax								
Returns with adjusted gross income of \$200,000 or more								
Total	0	0.0	0	0.0	174	4.1	245	5.8
Interest paid deduction	0	0.0	0	0.0	65	37.4	9	3.7
Investment interest expense deduction [1]	0	0.0	0	0.0	12	6.9	103	42.0
Taxes paid deduction	0	0.0	0	0.0	59	33.9	39	15.9
Charitable contributions deduction	0	0.0	0	0.0	**22	**12.6	**66	**26.9
Medical and dental expense deduction	0	0.0	0	0.0	0	0.0	**4	**1.6
Net casualty or theft loss deduction	0	0.0	0	0.0	0	0.0	0	0.0
Total miscellaneous deductions	0	0.0	0	0.0	**	**	**20	**8.2
General business credit	0	0.0	0	0.0	3	1.7	4	1.6
All other tax credits	0	0.0	0	0.0	0	0.0	**	**
Partnership and S corporation net losses	0	0.0	0	0.0	**13	**7.5	0	0.0
No second largest item	0	0.0	0	0.0	**	**	0	0.0
Returns with expanded income of \$200,000 or more								
Total	3	0.1	172	3.2	231	4.3	33	0.6
Interest paid deduction	**3	**100.0	**66	**38.4	4	1.7	**11	**33.3
Tax-exempt interest [3]	0	0.0	6	3.5	114	49.4	0	0.0
Taxes paid deduction	**	**	**60	**34.9	33	14.3	**19	**57.6
Charitable contributions deduction	0	0.0	20	11.6	61	26.4	0	0.0
Medical and dental expense deduction	0	0.0	0	0.0	**	**	**3	**9.1
Net casualty or theft loss deduction	0	0.0	0	0.0	0	0.0	0	0.0
Total miscellaneous deductions	0	0.0	**	**	11	4.8	**	**
General business credit	0	0.0	3	1.7	4	1.7	0	0.0
All other tax credits	0	0.0	0	0.0	**4	**1.7	0	0.0
Partnership and S corporation net losses	0	0.0	12	7.0	0	0.0	0	0.0
Foreign-earned income exclusion [3]	0	0.0	0	0.0	0	0.0	0	0.0
AMT tax preference [3]	0	0.0	**	**	**	**	0	0.0
Nontaxable Social Security benefits [3]	0	0.0	**5	**2.9	0	0.0	0	0.0
No second largest item	0	0.0	0	0.0	0	0.0	0	0.0

Footnotes at end of table.

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Table 8. Returns With and Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns and Percentages Classified by Item With the Largest Tax Effect and by Item With the Second Largest Tax Effect, Tax Year 2005—Continued

[All figures are estimates based on samples]

Item with the second largest tax effect	Item with the largest tax effect—continued					
	Tax-exempt interest [3]		AMT tax preference [3]		Nontaxable Social Security benefits [3]	
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(25)	(26)	(27)	(28)	(29)	(30)
Returns without worldwide income tax						
Returns with adjusted gross income of \$200,000 or more						
Total	0	0.0	0	0.0	0	0.0
Interest paid deduction	0	0.0	0	0.0	0	0.0
Investment interest expense deduction [1]	0	0.0	0	0.0	0	0.0
Taxes paid deduction	0	0.0	0	0.0	0	0.0
Charitable contributions deduction	0	0.0	0	0.0	0	0.0
Medical and dental expense deduction	0	0.0	0	0.0	0	0.0
Net casualty or theft loss deduction	0	0.0	0	0.0	0	0.0
Total miscellaneous deductions	0	0.0	0	0.0	0	0.0
General business credit	0	0.0	0	0.0	0	0.0
All other tax credits	0	0.0	0	0.0	0	0.0
Partnership and S corporation net losses	0	0.0	0	0.0	0	0.0
No second largest item	0	0.0	0	0.0	0	0.0
Returns with expanded income of \$200,000 or more						
Total	2,399	44.3	0	0.0	0	0.0
Interest paid deduction	206	8.6	0	0.0	0	0.0
Tax-exempt interest [3]	0	0.0	0	0.0	0	0.0
Taxes paid deduction	602	25.1	0	0.0	0	0.0
Charitable contributions deduction	**409	**17.0	0	0.0	0	0.0
Medical and dental expense deduction	527	22.0	0	0.0	0	0.0
Net casualty or theft loss deduction	38	1.6	0	0.0	0	0.0
Total miscellaneous deductions	169	7.0	0	0.0	0	0.0
General business credit	3	0.1	0	0.0	0	0.0
All other tax credits	**22	**0.9	0	0.0	0	0.0
Partnership and S corporation net losses	**293	**12.2	0	0.0	0	0.0
Foreign-earned income exclusion [3]	**	**	0	0.0	0	0.0
AMT tax preference [3]	**5	**0.2	0	0.0	0	0.0
Nontaxable Social Security benefits [3]	**48	**2.0	0	0.0	0	0.0
No second largest item	**77	**3.2	0	0.0	0	0.0

** Data combined to avoid disclosure of information for specific taxpayers.

[1] Investment interest expense deduction only has an effect when using the adjusted gross income concept.

[2] Less than 0.05 percent.

[3] Tax-exempt interest, foreign-earned income exclusion, AMT tax preference, and nontaxable Social Security benefits only have an effect when using the expanded income concept.

NOTE: Detail may not add to totals due to rounding. Total columns do not include returns with no tax effect.

High-Income Tax Returns for 2005

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Table 9. Returns Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns With Itemized Deductions, Credits, and Tax Preferences, as Percentages of Income, Tax Year 2005

[All figures are estimates based on samples]

Income concept and type of deduction, credit, or tax preference	Total	No deduction, credit, or tax preference	Number of returns on which income was reduced by percentages of income			
			Under 10 percent	10 percent under 20 percent	20 percent under 30 percent	30 percent under 40 percent
	(1)	(2)	(3)	(4)	(5)	(6)
Adjusted gross income concept						
Total itemized deductions	7,389	1,327	908	490	194	96
Interest paid deduction:						
Total	7,389	2,788	2,646	729	230	132
Investment interest per income concept	7,389	5,139	1,239	150	101	90
Taxes paid deduction	7,389	1,690	4,363	817	229	104
Charitable contributions deduction	7,389	2,464	3,107	291	127	181
Medical and dental expense deduction	7,389	6,640	189	52	37	31
Net casualty or theft loss deduction	7,389	6,390	67	17	14	12
Net limited miscellaneous deduction per income concept	7,389	5,605	1,205	293	128	56
Non-limited miscellaneous deduction	7,389	5,758	462	37	15	16
Deduction equivalent of:						
Total credits	7,389	3,852	301	70	70	81
Foreign tax credit	7,389	4,225	347	29	38	47
General business credit	7,389	7,259	90	17	11	**12
Tax preferences excluded from adjusted gross income	7,389	5,248	1,367	213	131	87
Nontaxable Social Security benefits	7,389	5,660	1,729	0	0	0
Expanded income concept						
Total itemized deductions	10,680	2,917	1,602	1,367	670	435
Interest paid deduction:						
Total	10,680	6,394	2,996	866	252	72
Investment interest per income concept	10,680	8,470	1,740	147	76	56
Taxes paid deduction	10,680	3,348	5,630	1,117	271	117
Charitable contributions deduction	10,680	4,069	4,427	554	304	197
Medical and dental expense deduction	10,680	8,210	1,128	241	149	130
Net casualty or theft loss deduction	10,680	9,637	99	26	19	15
Net limited miscellaneous deduction per income concept	10,680	7,482	2,382	479	163	63
Non-limited miscellaneous deduction	10,680	10,037	565	34	11	13
Deduction equivalent of:						
Total credits	10,680	4,928	585	188	196	285
Foreign tax credit	10,680	5,424	517	137	171	252
General business credit	10,680	10,547	90	22	8	**6
Tax preferences excluded from adjusted gross income	10,680	5,736	1,250	315	238	253
Nontaxable Social Security benefits	10,680	7,662	**3,018	**	0	0

Footnotes at end of table.

High-Income Tax Returns for 2005

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Table 9. Returns Without U.S. Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns With Itemized Deductions, Credits, and Tax Preferences, as Percentages of Income, Tax Year 2005—Continued

[All figures are estimates based on samples]

Income concept and type of deduction, credit, or tax preference	Number of returns on which income was reduced by percentages of income				
	40 percent under 50 percent	50 percent under 60 percent	60 percent under 70 percent	70 percent under 100 percent	100 percent or more
	(7)	(8)	(9)	(10)	(11)
Adjusted gross income concept—continued					
Total itemized deductions	54	51	45	610	3,614
Interest paid deduction:					
Total	114	91	100	300	259
Investment interest per income concept	83	89	91	228	179
Taxes paid deduction	55	39	20	29	43
Charitable contributions deduction	109	364	47	308	391
Medical and dental expense deduction	31	33	36	151	189
Net casualty or theft loss deduction	12	11	38	232	596
Net limited miscellaneous deduction per income concept	29	22	11	15	25
Non-limited miscellaneous deduction	12	12	25	532	520
Deduction equivalent of:					
Total credits	223	277	164	2,345	6
Foreign tax credit	125	182	122	2,268	6
General business credit	**	**	**	0	0
Tax preferences excluded from adjusted gross income	60	52	36	73	122
Nontaxable Social Security benefits	0	0	0	0	0
Expanded income concept—continued					
Total itemized deductions	317	290	257	936	1,889
Interest paid deduction:					
Total	30	14	7	25	24
Investment interest per income concept	33	28	16	42	72
Taxes paid deduction	56	35	21	41	44
Charitable contributions deduction	195	160	121	531	122
Medical and dental expense deduction	139	121	86	286	190
Net casualty or theft loss deduction	6	15	35	237	591
Net limited miscellaneous deduction per income concept	38	21	11	19	22
Non-limited miscellaneous deduction	**8	**	**	4	8
Deduction equivalent of:					
Total credits	607	1,155	969	**1,767	**
Foreign tax credit	516	1,051	925	**1,687	**
General business credit	7	**	**	0	0
Tax preferences excluded from adjusted gross income	262	299	350	1,648	329
Nontaxable Social Security benefits	0	0	0	0	0

** Data combined to avoid disclosure of information for specific taxpayers.

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

High-Income Tax Returns for 2005

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Table 10. Returns Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns With Itemized Deductions, Credits, and Tax Preferences, as Percentages of Income, Tax Year 2005

[All figures are estimates based on samples]

Income concept and type of deduction, credit, or tax preference	Total	No deduction, credit, or tax preference	Number of returns on which income was reduced by percentages of income			
			Under 10 percent	10 percent under 20 percent	20 percent under 30 percent	30 percent under 40 percent
	(1)	(2)	(3)	(4)	(5)	(6)
Adjusted gross income concept						
Total itemized deductions	4,224	13	51	61	45	12
Interest paid deduction:						
Total	4,224	1,156	1,552	455	171	109
Investment interest per income concept	4,224	2,612	754	101	77	76
Taxes paid deduction	4,224	121	2,999	648	197	85
Charitable contributions deduction	4,224	738	1,985	188	82	137
Medical and dental expense deduction	4,224	3,546	147	41	34	29
Net casualty or theft loss deduction	4,224	3,271	44	15	11	8
Net limited miscellaneous deduction per income concept	4,224	2,862	864	247	105	47
Non-limited miscellaneous deduction	4,224	2,737	338	29	11	15
Deduction equivalent of:						
Total credits	4,224	3,851	136	26	11	16
Foreign tax credit	4,224	4,224	0	0	0	0
General business credit	4,224	4,141	56	12	**	**9
Tax preferences excluded from adjusted gross income	4,224	2,633	925	182	110	68
Nontaxable Social Security benefits	4,224	2,749	1,475	0	0	0
Expanded income concept						
Total itemized deductions	5,420	342	319	586	446	319
Interest paid deduction:						
Total	5,420	3,095	1,437	531	203	61
Investment interest per income concept	5,420	3,878	1,165	108	63	46
Taxes paid deduction	5,420	373	3,606	921	237	97
Charitable contributions deduction	5,420	808	2,808	409	241	148
Medical and dental expense deduction	5,420	3,158	974	211	145	128
Net casualty or theft loss deduction	5,420	4,426	73	22	14	13
Net limited miscellaneous deduction per income concept	5,420	2,768	1,915	432	145	54
Non-limited miscellaneous deduction	5,420	4,925	430	25	9	12
Deduction equivalent of:						
Total credits	5,420	4,924	262	25	10	14
Foreign tax credit	5,420	5,420	0	0	0	0
General business credit	5,420	5,344	48	14	4	**4
Tax preferences excluded from adjusted gross income	5,420	1,294	742	267	200	225
Nontaxable Social Security benefits	5,420	2,746	2,674	0	0	0

Footnotes at end of table.

High-Income Tax Returns for 2005

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Table 10. Returns Without Worldwide Income Tax and With Income of \$200,000 or More Under Alternative Concepts: Number of Returns With Itemized Deductions, Credits, and Tax Preferences, as Percentages of Income, Tax Year 2005—Continued

[All figures are estimates based on samples]

Income concept and type of deduction, credit, or tax preference	Number of returns on which income was reduced by percentages of income				
	40 percent under 50 percent	50 percent under 60 percent	60 percent under 70 percent	70 percent under 100 percent	100 percent or more
	(7)	(8)	(9)	(10)	(11)
Adjusted gross income concept					
Total itemized deductions	11	15	6	401	3,609
Interest paid deduction:					
Total	96	79	87	261	258
Investment interest per income concept	68	82	78	198	178
Taxes paid deduction	49	36	18	28	43
Charitable contributions deduction	91	315	36	267	385
Medical and dental expense deduction	31	31	33	143	189
Net casualty or theft loss deduction	11	9	32	228	595
Net limited miscellaneous deduction per income concept	28	20	11	15	25
Non-limited miscellaneous deduction	11	9	25	529	520
Deduction equivalent of:					
Total credits	50	56	29	49	0
Foreign tax credit	0	0	0	0	0
General business credit	6	**	0	0	0
Tax preferences excluded from adjusted gross income	49	47	35	65	110
Nontaxable Social Security benefits	0	0	0	0	0
Expanded income concept					
Total itemized deductions	252	252	218	808	1,878
Interest paid deduction:					
Total	27	12	7	23	24
Investment interest per income concept	25	20	14	38	63
Taxes paid deduction	53	28	20	41	44
Charitable contributions deduction	164	133	102	486	121
Medical and dental expense deduction	136	118	83	277	190
Net casualty or theft loss deduction	5	13	32	231	591
Net limited miscellaneous deduction per income concept	36	19	11	18	22
Non-limited miscellaneous deduction	3	**	**8	**	8
Deduction equivalent of:					
Total credits	44	66	26	49	0
Foreign tax credit	0	0	0	0	0
General business credit	6	**	**	0	0
Tax preferences excluded from adjusted gross income	223	260	308	1,572	329
Nontaxable Social Security benefits	0	0	0	0	0

** Data combined to avoid disclosure of information for specific taxpayers.

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

High-Income Tax Returns for 2005

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Table 11. Returns With and Without U.S. Income Tax: Number and Percentages of Returns, by Effective Tax Rate, and by Size of Income Under Alternative Concepts, Tax Year 2005

[All figures are estimates based on samples]

Tax status, effective tax rate	Total		Size of adjusted gross income		
			Under \$50,000 [1]		\$50,000 under \$100,000
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns
	(1)	(2)	(3)	(4)	(5)
All returns	134,372,678	100.0	91,195,160	100.0	28,801,026
Returns without U.S. income tax	42,029,489	31.3	40,999,249	45.0	979,868
Returns with U.S. income tax	92,343,188	68.7	50,195,911	55.0	27,821,158
Effective tax rate:					
Under 5 percent	28,134,683	20.9	23,065,132	25.3	4,705,119
5 under 10 percent	35,532,603	26.4	20,852,801	22.9	12,757,418
10 under 15 percent	19,688,239	14.7	6,233,690	6.8	7,673,587
15 under 20 percent	6,594,318	4.9	20,809	[2]	2,669,644
20 under 25 percent	1,563,842	1.2	7,813	[2]	13,570
25 under 30 percent	684,997	0.5	4,130	[2]	1,298
30 under 35 percent	133,474	0.1	5,192	[2]	316
35 under 40 percent	2,421	[2]	352	[2]	11
40 under 45 percent	476	[2]	42	[2]	8
45 under 50 percent	480	[2]	3	[2]	12
50 under 60 percent	994	[2]	354	[2]	143
60 under 70 percent	757	[2]	71	[2]	8
70 under 80 percent	289	[2]	0	0.0	0
80 percent or more	5,615	[2]	5,522	[2]	23
Tax status, effective tax rate	Size of adjusted gross income—continued				
	\$50,000 under \$100,000	\$100,000 under \$200,000		\$200,000 or more	
	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(6)	(7)	(8)	(9)	(10)
All returns	100.0	10,810,367	100.0	3,566,125	100.0
Returns without U.S. income tax	3.4	42,984	0.4	7,389	0.2
Returns with U.S. income tax	96.6	10,767,383	99.6	3,558,736	99.8
Effective tax rate:					
Under 5 percent	16.3	324,398	3.0	40,034	1.1
5 under 10 percent	44.3	1,854,681	17.2	67,703	1.9
10 under 15 percent	26.6	5,444,860	50.4	336,102	9.4
15 under 20 percent	9.3	2,775,312	25.7	1,128,554	31.6
20 under 25 percent	[2]	359,398	3.3	1,183,060	33.2
25 under 30 percent	[2]	7,222	0.1	672,348	18.9
30 under 35 percent	[2]	943	[2]	127,023	3.6
35 under 40 percent	[2]	376	[2]	1,681	[2]
40 under 45 percent	[2]	9	[2]	417	[2]
45 under 50 percent	[2]	52	[2]	413	[2]
50 under 60 percent	[2]	106	[2]	391	[2]
60 under 70 percent	[2]	10	**	667	**
70 under 80 percent	0.0	**	**	289	**
80 percent or more	[2]	15	[2]	55	[2]

Footnotes at end of table.

High-Income Tax Returns for 2005

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Table 11. Returns With and Without U.S. Income Tax: Number and Percentages of Returns, by Effective Tax Rate, and by Size of Income Under Alternative Concepts, Tax Year 2005—Continued

[All figures are estimates based on samples]

Tax status, effective tax rate	Total		Size of expanded income		
			Under \$50,000 [1]		\$50,000 under \$100,000
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns
	(11)	(12)	(13)	(14)	(15)
All returns	134,372,678	100.0	90,292,532	100.0	29,853,509
Returns without U.S. income tax	42,029,489	31.3	40,912,881	45.3	1,046,370
Returns with U.S. income tax	92,343,188	68.7	49,379,651	54.7	28,807,139
Effective tax rate:					
Under 5 percent	28,718,318	21.4	22,967,114	25.4	5,365,746
5 under 10 percent	34,621,047	25.8	19,822,283	22.0	13,025,772
10 under 15 percent	19,875,835	14.8	6,521,423	7.2	7,658,730
15 under 20 percent	6,694,150	5.0	45,037	[2]	2,733,006
20 under 25 percent	1,597,287	1.2	6,825	[2]	21,530
25 under 30 percent	697,658	0.5	5,401	[2]	1,985
30 under 35 percent	129,702	0.1	4,562	[2]	317
35 under 40 percent	1,595	[2]	357	[2]	0
40 under 45 percent	780	[2]	672	[2]	8
45 under 50 percent	279	[2]	8	[2]	11
50 under 60 percent	646	[2]	369	[2]	9
60 under 70 percent	84	[2]	14	[2]	8
70 under 80 percent	10	[2]	0	0.0	0
80 percent or more	5,797	[2]	5,586	[2]	16
Tax status, effective tax rate	Size of expanded income—continued				
	\$50,000 under \$100,000	\$100,000 under \$200,000		\$200,000 or more	
	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(16)	(17)	(18)	(19)	(20)
All returns	100.0	10,642,626	100.0	3,584,012	100.0
Returns without U.S. income tax	3.5	59,558	0.6	10,680	0.3
Returns with U.S. income tax	96.5	10,583,067	99.4	3,573,331	99.7
Effective tax rate:					
Under 5 percent	18.0	325,443	3.1	60,015	1.7
5 under 10 percent	43.6	1,687,823	15.9	85,169	2.4
10 under 15 percent	25.7	5,341,088	50.2	354,594	9.9
15 under 20 percent	9.2	2,822,030	26.5	1,094,077	30.5
20 under 25 percent	0.1	390,853	3.7	1,178,079	32.9
25 under 30 percent	[2]	14,377	0.1	675,895	18.9
30 under 35 percent	[2]	902	[2]	123,920	3.5
35 under 40 percent	0.0	367	[2]	871	[2]
40 under 45 percent	[2]	47	[2]	53	[2]
45 under 50 percent	[2]	9	[2]	250	[2]
50 under 60 percent	[2]	109	[2]	158	[2]
60 under 70 percent	[2]	9	[2]	53	[2]
70 under 80 percent	0.0	3	[2]	7	[2]
80 percent or more	[2]	6	[2]	188	[2]

** Data deleted to avoid disclosure of information for specific taxpayers. However, deleted data are included in the appropriate totals.

[1] Includes returns with adjusted gross deficit or with negative expanded income.

[2] Less than 0.05 percent.

NOTE: Detail may not add to totals due to rounding.

High-Income Tax Returns for 2005

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Table 12. Returns With and Without Worldwide Income Tax: Number and Percentages of Returns, by Effective Tax Rate, and by Size of Income Under Alternative Concepts, Tax Year 2005

[All figures are estimates based on samples]

Tax status, effective tax rate	Total		Size of adjusted gross income		
			Under \$50,000 [1]		\$50,000 under \$100,000
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns
	(1)	(2)	(3)	(4)	(5)
All returns	134,372,678	100.0	91,195,160	100.0	28,801,026
Returns without worldwide income tax	41,825,753	31.1	40,847,507	44.8	941,526
Returns with worldwide income tax	92,546,925	68.9	50,347,653	55.2	27,859,501
Effective tax rate:					
Under 5 percent	28,211,428	21.0	23,167,093	25.4	4,710,615
5 under 10 percent	35,539,655	26.4	20,881,136	22.9	12,754,515
10 under 15 percent	19,704,263	14.7	6,248,992	6.9	7,688,614
15 under 20 percent	6,621,258	4.9	20,809	[2]	2,679,942
20 under 25 percent	1,575,574	1.2	6,848	[2]	14,375
25 under 30 percent	704,447	0.5	5,095	[2]	2,401
30 under 35 percent	149,512	0.1	5,192	[2]	1,273
35 under 40 percent	13,170	[2]	355	[2]	1,561
40 under 45 percent	6,238	[2]	696	[2]	1,009
45 under 50 percent	2,984	[2]	101	[2]	616
50 under 60 percent	6,422	[2]	2,597	[2]	2,714
60 under 70 percent	2,634	[2]	727	**	1,210
70 under 80 percent	765	[2]	**	**	313
80 percent or more	8,574	[2]	8,013	[2]	342
Tax status, effective tax rate	Size of adjusted gross income—continued				
	\$50,000 under \$100,000	\$100,000 under \$200,000		\$200,000 or more	
	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(6)	(7)	(8)	(9)	(10)
All returns	100.0	10,810,367	100.0	3,566,125	100.0
Returns without worldwide income tax	3.3	32,497	0.3	4,224	0.1
Returns with worldwide income tax	96.7	10,777,870	99.7	3,561,901	99.9
Effective tax rate:					
Under 5 percent	16.4	311,965	2.9	21,755	0.6
5 under 10 percent	44.3	1,844,667	17.1	59,337	1.7
10 under 15 percent	26.7	5,442,868	50.3	323,789	9.1
15 under 20 percent	9.3	2,792,176	25.8	1,128,331	31.6
20 under 25 percent	[2]	367,072	3.4	1,187,280	33.3
25 under 30 percent	[2]	10,049	0.1	686,902	19.3
30 under 35 percent	[2]	2,428	[2]	140,619	3.9
35 under 40 percent	[2]	2,247	[2]	9,006	0.3
40 under 45 percent	[2]	2,284	[2]	2,250	0.1
45 under 50 percent	[2]	1,305	[2]	962	[2]
50 under 60 percent	[2]	462	[2]	649	[2]
60 under 70 percent	**	26	[2]	671	[2]
70 under 80 percent	**	301	[2]	150	[2]
80 percent or more	[2]	19	[2]	200	[2]

Footnotes at end of table.

High-Income Tax Returns for 2005

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Table 12. Returns With and Without Worldwide Income Tax: Number and Percentages of Returns, by Effective Tax Rate, and by Size of Income Under Alternative Concepts, Tax Year 2005—Continued

[All figures are estimates based on samples]

Tax status, effective tax rate	Total		Size of expanded income		
			Under \$50,000 [1]		\$50,000 under \$100,000
	Number of returns	Percentage of total	Number of returns	Percentage of total	Number of returns
	(11)	(12)	(13)	(14)	(15)
All returns	134,372,678	100.0	90,292,532	100.0	29,853,509
Returns without worldwide income tax	41,825,753	31.1	40,771,976	45.2	1,006,340
Returns with worldwide income tax	92,546,925	68.9	49,520,556	54.8	28,847,168
Effective tax rate:					
Under 5 percent	28,797,530	21.4	23,067,676	25.5	5,387,191
5 under 10 percent	34,626,148	25.8	19,847,273	22.0	13,020,825
10 under 15 percent	19,905,912	14.8	6,536,108	7.2	7,677,039
15 under 20 percent	6,723,697	5.0	45,037	[2]	2,737,574
20 under 25 percent	1,617,961	1.2	6,497	[2]	22,184
25 under 30 percent	719,378	0.5	6,367	[2]	1,982
30 under 35 percent	144,191	0.1	4,562	[2]	320
35 under 40 percent	3,544	[2]	357	[2]	0.0
40 under 45 percent	1,672	[2]	672	[2]	8
45 under 50 percent	309	[2]	8	[2]	11
50 under 60 percent	652	[2]	369	[2]	9
60 under 70 percent	88	[2]	14	[2]	8
70 under 80 percent	12	[2]	0.0	0.0	0.0
80 percent or more	5,830	[2]	5,616	[2]	16

Tax status, effective tax rate	Size of expanded income—continued				
	\$50,000 under \$100,000	\$100,000 under \$200,000		\$200,000 or more	
	Percentage of total	Number of returns	Percentage of total	Number of returns	Percentage of total
	(16)	(17)	(18)	(19)	(20)
All returns	100.0	10,642,626	100.0	3,584,012	100.0
Returns without worldwide income tax	3.4	42,017	0.4	5,420	0.2
Returns with worldwide income tax	96.6	10,600,609	99.6	3,578,591	99.8
Effective tax rate:					
Under 5 percent	18.0	311,695	2.9	30,967	0.9
5 under 10 percent	43.6	1,682,631	15.8	75,420	2.1
10 under 15 percent	25.7	5,344,528	50.2	348,238	9.7
15 under 20 percent	9.2	2,843,904	26.7	1,097,183	30.6
20 under 25 percent	0.1	399,061	3.7	1,190,218	33.2
25 under 30 percent	[2]	15,563	0.1	695,467	19.4
30 under 35 percent	[2]	1,788	[2]	137,520	3.8
35 under 40 percent	0.0	663	[2]	2,524	0.1
40 under 45 percent	[2]	638	[2]	354	[2]
45 under 50 percent	[2]	9	[2]	281	[2]
50 under 60 percent	[2]	110	[2]	163	[2]
60 under 70 percent	[2]	9	[2]	57	[2]
70 under 80 percent	0.0	3	[2]	9	[2]
80 percent or more	[2]	6	[2]	191	[2]

** Data deleted to avoid disclosure of information for specific taxpayers. However, deleted data are included in the appropriate totals.

[1] Includes returns with adjusted gross deficit or with negative expanded income.

[2] Less than 0.05 percent.

NOTE: Detail may not add to totals due to rounding.

Individual Noncash Contributions, 2005

by Janette Wilson

For Tax Year 2005, 25.4 million individual taxpayers who itemized deductions reported \$48.1 billion in deductions for noncash charitable contributions. Of these taxpayers, 6.6 million reported \$41.1 billion in charitable contributions on Form 8283, *Noncash Charitable Contributions*. This is the form used by individual taxpayers when the amount of taxpayer deductions for all noncash donations on Schedule A, *Itemized Deductions*, exceeds \$500. The number of filers remained about the same between Tax Years 2004 and 2005, but the amount of donation contributions increased 10.4 percent from \$37.2 billion in Tax Year 2004.

For Tax Year 2005, tax law changes altered the deduction rules for some charitable contributions. The most significant change was made to the deduction amount allowable for vehicle donations. In previous years, taxpayers could deduct the fair market value of the automobile. Starting in 2005, the deductible amount for most donated vehicles was changed to the lesser of the fair market value or the gross proceeds from the sale of the vehicle by the donee.¹

The effects of this tax law change are reflected in the data. As shown in Figure B, the number of automobile donations decreased 67.0 percent from about 900.7 thousand in Tax Year 2004, to 297.1 thousand in Tax Year 2005. The amount claimed for these donations declined by 80.6 percent from \$2.4 billion in 2004 to \$0.5 billion in 2005.²

Figure A shows that, in Tax Year 2005, corporate stock, followed by clothing and household donations, were the largest categories in terms of total donated amount (\$16.3 billion, \$7.0 billion, and \$3.9 billion, respectively) carried to Schedule A. Figure B shows that this pattern did not change from Tax Year 2004. However, there were significant changes in some other categories. As previously mentioned, vehicle donations fell significantly. Donations of land, which represented about 7.1 percent of the value of donations deducted, increased by about 64.0 percent to \$2.9 billion, despite the fact that the number of these

donations fell 26.1 percent from 13.4 thousand to 9.9 thousand. Conservation easement donations, which represented about 4.4 percent of donations deducted, also increased substantially in terms of the amount deducted. The amount carried to Schedule A almost doubled from \$0.9 billion to \$1.8 billion, while the number of donations increased 12.3 percent from 1.9 thousand to 2.2 thousand.

Figure C shows that those taxpayers in the \$10-million or more adjusted gross income (AGI) category gave the most donations in terms of amount, followed by those taxpayers in the \$100-thousand under \$200-thousand group (representing 27.1 percent and 13.3 percent of all donation amounts, respectively). The average donation of taxpayers in the \$10-million or more AGI category was \$2.1 million. In contrast, the average donation for those taxpayers in the \$100 under \$200 thousand AGI class was \$2,638 and for all returns was \$6,262.

Figure D shows that the percentage change in donations by AGI, in general, increased in the upper income groups (starting with those making over \$1.5 million) and fell in the middle income groups. Those taxpayers with \$10-million or more AGI increased their donation amounts by 36.5 percent, from \$8.2 billion in Tax Year 2004 to \$11.1 billion in 2005.

Figures E and G show information on donee types (organizations). In terms of donation amount, the most donations were given to foundations, large organizations, religious organizations, and educational institutions (\$9.8 billion, \$8.5 billion, \$4.5 billion, and \$4.2 billion, respectively). Figure F shows that, for Tax Year 2004, most donations were given to foundations followed by large organizations, but the third largest recipient was educational institutions followed by religious organizations.

There was an 88.7-percent increase in donations to environmental and animal organizations, from \$1.8 billion in 2004 to \$3.3 billion in Tax Year 2005, even though the number of returns with donations to these organizations, decreased nearly 10 percent. Although donor-advised funds only represented 3.9 percent of the amount deducted on Schedule A, they had the highest average per donation amount of \$56,452. This represents an increase of 60.4 percent in dona-

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¹ The American Jobs Creation Act of 2004, Public Law 108-357, limits the allowable deduction for donated vehicles to the sale proceeds of the donation by the donee. There are a few exceptions. Fair market value can still be deducted when the charity uses the vehicle for its own purposes, if the charity makes material improvements to the vehicle, or if the charity donates or sells the vehicle to a needy individual significantly below market price. In addition, the new 2005 instructions state that fair market value cannot be more than the private party sale price for a similar vehicle found in a used vehicle pricing guide.

² The overall effects of the law change for valuing donated vehicles may be overstated by these comparisons because vehicle donations are not reported separately on Schedule A by taxpayers whose total deductions for noncash donations does not exceed \$500. Thus, the number of such additional donations is not known.

Individual Noncash Contributions, 2005

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Figure A

Individual Noncash Charitable Contributions: All Returns with Donations, by Donation Types, Form 8283, Tax Year 2005

[Money amounts are in thousands of dollars, except average amounts are in whole dollars]

Type of donation	Number of returns [1]	Number of donations	Amount carried to Schedule A	Average amount per return	Average amount per donation	Percentage of number of donations	Percentage of amount carried to Schedule A
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All donations	6,559,140	16,465,082	41,070,632	6,262	2,494	100.0	100.0
Corporate stock	181,192	399,828	16,336,601	90,162	40,859	2.4	39.8
Mutual funds	7,736	11,087	669,646	86,557	60,401	0.1	1.6
Other investments	4,853	7,844	1,577,085	324,975	201,064	[2]	3.8
Real estate	7,654	8,203	1,183,888	154,678	144,320	[2]	2.9
Land	9,883	10,477	2,915,322	294,974	278,265	0.1	7.1
Conservation easements	2,186	2,307	1,815,814	830,481	787,062	[2]	4.4
Façade easements	1,028	1,132	307,370	299,080	271,629	[2]	0.7
Art and collectibles	110,632	178,391	1,244,906	11,253	6,979	1.1	3.0
Intellectual property	1,021	1,023	19,932	19,520	19,481	[2]	[2]
Food	195,807	271,088	105,870	541	391	1.6	0.3
Clothing	4,692,990	8,304,578	7,021,681	1,496	846	50.4	17.1
Accessories	50,691	72,109	58,586	1,156	812	0.4	0.1
Electronics	517,625	622,628	474,505	917	762	3.8	1.2
Household items	2,864,635	5,000,319	3,858,494	1,347	772	30.4	9.4
Cars	297,070	311,451	469,695	1,581	1,508	1.9	1.1
Other vehicles	12,807	13,921	140,621	10,980	10,101	0.1	0.3
Services	13,907	21,910	47,881	3,443	2,185	0.1	0.1
Airline tickets and miles	1,559	1,565	2,040	1,308	1,303	[2]	[2]
Other	794,323	1,225,222	2,820,696	3,551	2,302	7.4	6.9

[1] Total number of returns does not equal the sum of returns by donation type because a return could have more than one type of donation.

[2] Less than 0.05 percent.

Figure B

Individual Noncash Charitable Contributions: All Returns with Donations, by Donation Types, Form 8283, Tax Years 2004 and 2005.

[Money amounts are in thousands of dollars]

Type of donation	2004		2005		Percentage change	
	Number of returns [1]	Amount carried to Schedule A	Number of returns [1]	Amount carried to Schedule A	Number of returns	Amount carried to Schedule A
	(1)	(2)	(3)	(4)	(5)	(6)
All donations	6,565,034	37,189,160	6,559,140	41,070,632	-0.1	10.4
Corporate stock	170,819	15,053,389	181,192	16,336,601	6.1	8.5
Mutual funds	6,173	482,351	7,736	669,646	25.3	38.8
Other investments	5,158	1,015,953	4,853	1,577,085	-5.9	55.2
Real estate	11,985	1,334,354	7,654	1,183,888	-36.1	-11.3
Land	13,371	1,778,173	9,883	2,915,322	-26.1	64.0
Conservation easements	1,948	911,909	2,186	1,815,814	12.3	99.1
Façade easements	1,023	537,301	1,028	307,370	0.4	-42.8
Art and collectibles	108,554	928,950	110,632	1,244,906	1.9	34.0
Intellectual property	173	30,995	1,021	19,932	490.5	-35.7
Food	194,369	104,409	195,807	105,870	0.7	1.4
Clothing	4,386,808	6,293,839	4,692,990	7,021,681	7.0	11.6
Accessories	60,267	37,508	50,691	58,586	-15.9	56.2
Electronics	549,195	477,406	517,625	474,505	-5.7	-0.6
Household items	2,620,600	3,464,077	2,864,635	3,858,494	9.3	11.4
Cars	900,691	2,421,650	297,070	469,695	-67.0	-80.6
Other vehicles	17,409	205,045	12,807	140,621	-26.4	-31.4
Services	8,073	19,464	13,907	47,881	72.3	146.0
Airline tickets and miles	7,552	7,413	1,559	2,040	-79.4	-72.5
Other	829,240	2,084,974	794,323	2,820,696	-4.2	35.3

[1] Total number of returns does not equal the sum of returns by donation type because a return could have more than one type of donation.

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Figure C

Individual Noncash Charitable Contributions: All Returns with Donations, All Donation Types, by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

[Money amounts are in thousands of dollars, except average amounts are in whole dollars]

Size of adjusted gross income	Number of returns	Percentage of returns	Adjusted gross income (AGI)	Amount carried to Schedule A	Percentage of amount carried to Schedule A	Donation as percent of AGI	Average donation per return
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All returns	6,559,140	100.0	1,137,659,788	41,070,632	100.0	3.6	6,262
Under \$5,000 (including deficits)	37,402	0.6	-6,553,018	350,927	0.9	-5.4	9,383
\$5,000 under \$10,000	32,164	0.5	251,833	56,187	0.1	22.3	1,747
\$10,000 under \$15,000	51,997	0.8	651,802	85,897	0.2	13.2	1,652
\$15,000 under \$20,000	85,630	1.3	1,503,639	227,358	0.6	15.1	2,655
\$20,000 under \$25,000	94,313	1.4	2,122,426	203,180	0.5	9.6	2,154
\$25,000 under \$30,000	108,225	1.6	2,998,970	281,359	0.7	9.4	2,600
\$30,000 under \$40,000	338,160	5.2	11,931,876	774,975	1.9	6.5	2,292
\$40,000 under \$50,000	404,686	6.2	18,354,263	869,751	2.1	4.7	2,149
\$50,000 under \$75,000	1,206,015	18.4	75,380,749	2,648,338	6.4	3.5	2,196
\$75,000 under \$100,000	1,227,279	18.7	106,677,980	2,446,824	6.0	2.3	1,994
\$100,000 under \$200,000	2,066,716	31.5	280,489,240	5,451,006	13.3	1.9	2,638
\$200,000 under \$500,000	684,658	10.4	198,420,245	4,570,700	11.1	2.3	6,676
\$500,000 under \$1,000,000	135,385	2.1	91,729,123	2,140,922	5.2	2.3	15,814
\$1,000,000 under \$1,500,000	34,558	0.5	41,702,310	2,044,341	5.0	4.9	59,156
\$1,500,000 under \$2,000,000	15,286	0.2	26,354,815	1,591,485	3.9	6.0	104,116
\$2,000,000 under \$5,000,000	24,287	0.4	73,183,729	3,717,494	9.1	5.1	153,067
\$5,000,000 under \$10,000,000	6,995	0.1	48,231,156	2,467,162	6.0	5.1	352,712
\$10,000,000 or more	5,385	0.1	164,228,650	11,142,727	27.1	6.8	2,069,216

Figure D

Individual Noncash Charitable Contributions: All Returns with Donations, by Size of Adjusted Gross Income, Form 8283, Tax Years 2004 and 2005

[Money amounts are in thousands of dollars]

Size of adjusted gross income	2004		2005		Percentage change	
	Number of returns	Amount carried to Schedule A	Number of returns	Amount carried to Schedule A	Number of returns	Amount carried to Schedule A
	(1)	(2)	(3)	(4)	(5)	(6)
All returns	6,565,034	37,189,160	6,559,140	41,070,632	-0.1	10.4
Under \$5,000 (including deficits)	40,118	276,801	37,402	350,927	-6.8	26.8
\$5,000 under \$10,000	24,655	42,061	32,164	56,187	30.5	33.6
\$10,000 under \$15,000	62,273	105,344	51,997	85,897	-16.5	-18.5
\$15,000 under \$20,000	66,976	157,038	85,630	227,358	27.9	44.8
\$20,000 under \$25,000	102,786	244,395	94,313	203,180	-8.2	-16.9
\$25,000 under \$30,000	149,797	333,138	108,225	281,359	-27.8	-15.5
\$30,000 under \$40,000	360,675	894,095	338,160	774,975	-6.2	-13.3
\$40,000 under \$50,000	428,046	891,853	404,686	869,751	-5.5	-2.5
\$50,000 under \$75,000	1,245,509	2,698,626	1,206,015	2,648,338	-3.2	-1.9
\$75,000 under \$100,000	1,307,939	2,743,905	1,227,279	2,446,824	-6.2	-10.8
\$100,000 under \$200,000	1,945,236	5,743,239	2,066,716	5,451,006	6.2	-5.1
\$200,000 under \$500,000	638,059	3,864,534	684,658	4,570,700	7.3	18.3
\$500,000 under \$1,000,000	120,910	2,323,597	135,385	2,140,922	12.0	-7.9
\$1,000,000 under \$1,500,000	29,289	2,157,059	34,558	2,044,341	18.0	-5.2
\$1,500,000 under \$2,000,000	12,768	1,136,092	15,286	1,591,485	19.7	40.1
\$2,000,000 under \$5,000,000	20,469	3,091,183	24,287	3,717,494	18.7	20.3
\$5,000,000 under \$10,000,000	5,558	2,320,947	6,995	2,467,162	25.9	6.3
\$10,000,000 or more	3,972	8,165,251	5,385	11,142,727	35.6	36.5

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Figure E

Individual Noncash Charitable Contributions: All Returns with Donations, by Donee Types, Form 8283, Tax Year 2005

[Money amounts are in thousands of dollars, except average amounts are in whole dollars]

Type of donee	Number of returns [1]	Number of donations	Amount carried to Schedule A	Average amount per return	Average amount per donation	Percentage of number of donations	Percentage of amount carried to Schedule A
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All donees	6,559,140	16,465,082	41,070,632	6,262	2,494	100.0	100.0
Arts, culture, and humanities	235,690	326,247	1,338,311	5,678	4,102	2.0	3.3
Educational institutions	343,200	482,988	4,160,844	12,124	8,615	2.9	10.1
Environment and animals	106,106	129,314	3,348,537	31,558	25,895	0.8	8.2
Health and medical research	919,940	1,334,696	1,611,826	1,752	1,208	8.1	3.9
Large organizations	4,931,660	9,573,536	8,472,212	1,718	885	58.1	20.6
Public and societal benefit	1,266,610	1,884,312	2,746,584	2,168	1,458	11.4	6.7
Religious organizations	1,257,036	1,904,357	4,506,943	3,585	2,367	11.6	11.0
Donor-advised funds	17,573	28,608	1,614,979	91,904	56,452	0.2	3.9
Foundations	147,717	203,997	9,811,124	66,419	48,095	1.2	23.9
Other donees	471,373	597,028	3,459,273	7,339	5,794	3.6	8.4

[1] Total number of returns does not equal the sum of returns by donee type because a return could have more than one donee type.

Figure F

Individual Noncash Charitable Contributions: All Returns with Donations, by Donee Types, Form 8283, Tax Years 2004 and 2005

[Money amounts are in thousands of dollars]

Type of donee	2004		2005		Percentage change	
	Number of returns [1]	Amount carried to Schedule A	Number of returns [1]	Amount carried to Schedule A	Number of returns	Amount carried to Schedule A
	(1)	(2)	(3)	(4)	(5)	(6)
All donees	6,565,034	37,189,160	6,559,140	41,070,632	-0.1	10.4
Arts, culture, and humanities	230,476	1,568,784	235,690	1,338,311	2.3	-14.7
Educational institutions	334,849	4,329,920	343,200	4,160,844	2.5	-3.9
Environment and animals	117,714	1,774,812	106,106	3,348,537	-9.9	88.7
Health and medical research	893,996	2,026,762	919,940	1,611,826	2.9	-20.5
Large organizations	4,761,242	8,073,046	4,931,660	8,472,212	3.6	4.9
Public and societal benefit	1,571,091	3,056,819	1,266,610	2,746,584	-19.4	-10.1
Religious organizations	1,374,135	4,113,568	1,257,036	4,506,943	-8.5	9.6
Donor-advised funds	13,490	1,006,825	17,573	1,614,979	30.3	60.4
Foundations	145,449	8,487,483	147,717	9,811,124	1.6	15.6
Other donees	356,386	2,751,140	471,373	3,459,273	32.3	25.7

[1] Total number of returns does not equal the sum of returns by donee type because a return could have more than one donee type.

tion amount, from \$1.0 billion in Tax Year 2004 to \$1.6 billion in 2005.

Figure H shows that taxpayers age 65 and older gave the most donations in terms of amount deducted on Schedule A (more than one-third of the total). Their average donation per return (\$17,023) was more than twice the average of any other age group.

Also, their contribution as a percentage of AGI (7.8 percent) was also more than twice the average of any other group.

Figure I shows that the amount deducted by these taxpayers increased about 12.0 percent, from \$12.6 billion in Tax Year 2004 to \$14.1 billion in 2005. Details in Table 4 show that, of the total do-

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Figure G

Amount of Individual Noncash Charitable Contributions by Donee Types, Tax Years 2004 and 2005

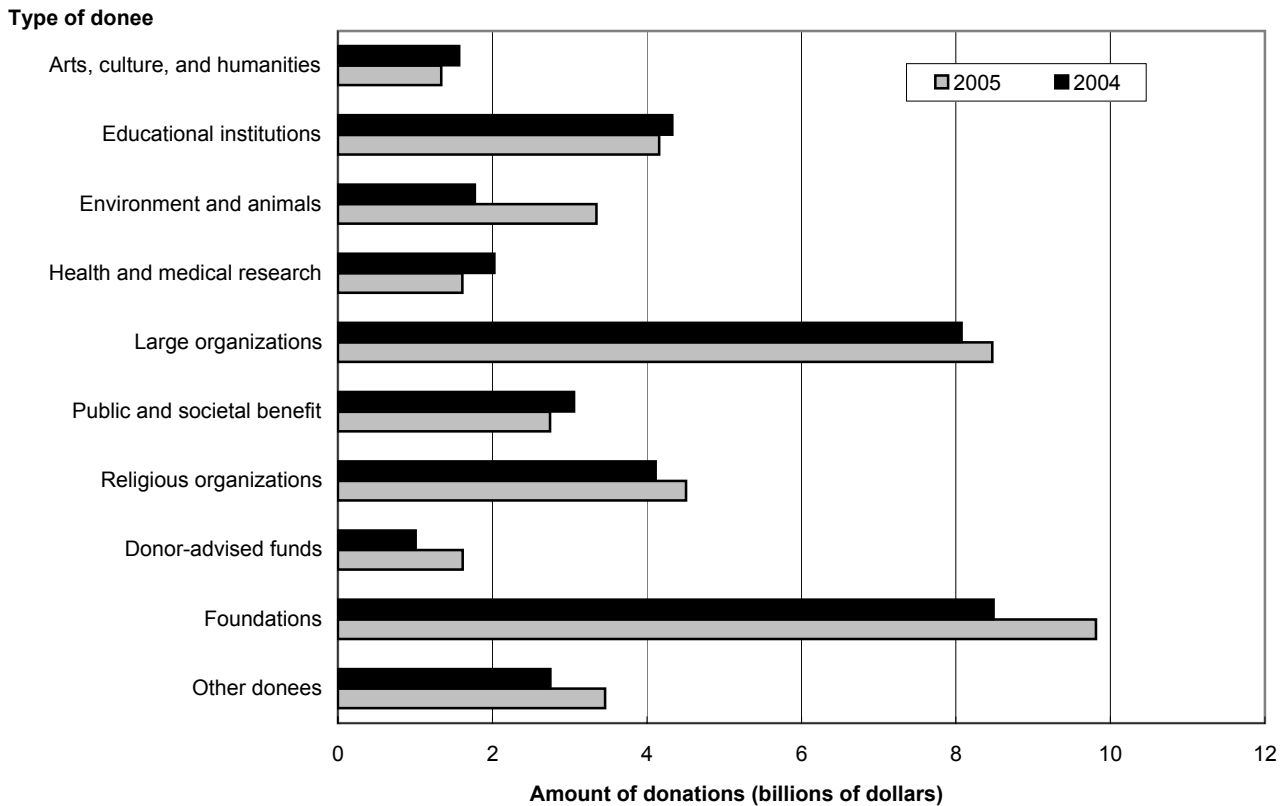


Figure H

Individual Noncash Charitable Contributions: All Returns with Donations, by Age of Donor, Form 8283, Tax Year 2005

[Money amounts are in thousands of dollars, except average amounts are in whole dollars]

Donor age	Number of returns	Amount carried to Schedule A	Average amount per return	Adjusted gross income (AGI)	Noncash contributions as a percentage of AGI	Number of returns on Schedule A with cash contributions	Amount of cash contributions on Schedule A
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All ages	6,559,140	41,070,632	6,262	1,137,659,788	3.6	6,053,552	30,583,284
Under 35	793,262	2,231,510	2,813	84,070,881	2.7	668,197	1,688,893
35 under 45	1,683,889	6,071,559	3,606	257,639,450	2.4	1,535,461	4,906,539
45 under 55	1,873,519	8,949,908	4,777	343,767,216	2.6	1,753,877	7,966,096
55 under 65	1,382,485	9,756,707	7,057	271,149,362	3.6	1,312,001	7,598,431
65 and older	825,984	14,060,948	17,023	181,032,879	7.8	784,018	8,423,325

nations by taxpayers 65 or over, \$9.4 billion were donations of corporate stock, mutual funds, and other investments (up 16.5 percent from \$8.1 million

in 2004), followed by \$1.7 billion in real estate and easement donations (down from \$1.9 billion in Tax Year 2004).³

³ See Wilson, Janette and Michael Strudler, "Individual Noncash Charitable Contributions, 2004," *Statistics of Income Bulletin*, Spring 2007, Volume 25, Number 4.

Figure I

Individual Noncash Charitable Contributions: All Returns with Donations, by Age of Donor, Form 8283, Tax Years 2004 and 2005

[Money amounts are in thousands of dollars]

Donor age	2004		2005		Percentage change	
	Number of returns	Amount carried to Schedule A	Number of returns	Amount carried to Schedule A	Number of returns	Amount carried to Schedule A
	(1)	(2)	(3)	(4)	(5)	(6)
All ages	6,565,034	37,189,160	6,559,140	41,070,632	-0.1	10.4
Under 35	826,012	2,045,066	793,262	2,231,510	-4.0	9.1
35 under 45	1,671,313	5,605,235	1,683,889	6,071,559	0.8	8.3
45 under 55	1,892,001	8,510,992	1,873,519	8,949,908	-1.0	5.2
55 under 65	1,417,852	8,475,131	1,382,485	9,756,707	-2.5	15.1
65 and older	757,856	12,552,736	825,984	14,060,948	9.0	12.0

Explanation of Selected Terms

Amount Carried to Schedule A—This is the fair market value from Section A (items with a deduction of \$5,000 or less or publicly-traded securities) plus the lesser of the fair market value or amount claimed on Section B (items with a deduction of more than \$5,000).

Amount Claimed—This amount is reported on Section B only. For ordinary income property, the amount claimed is the fair market value minus the amount of ordinary income or short-term gain. For capital gain property, the fair market value is usually used. For bargain sales (a sale or exchange for less than the fair market value), the amount claimed is the fair market value minus the amount received for the sale.

Donor's Cost—Also known as the adjusted basis or tax basis, this is the amount the owner paid for the property. If the property was received as a gift, the donor's cost carries over to the donee, increased by any gift tax paid on the appreciated portion of the property. If acquired from a decedent, the basis is the fair market value of the property used for estate tax purposes.

Fair Market Value—The fair market value is the value a willing and knowledgeable buyer would pay a seller in a voluntary situation.

Number of Donations—For this study, data were collected in the manner they were reported by the taxpayer. For example, if clothing were listed twice even though it was given to the same donee organization, it was counted as two separate donations.

Number of Returns—This is the number of returns that had a Form 8283 attached in the Individual

SOI sample. For this study, all returns were used whether or not the taxpayer carried the Form 8283 amounts to the Schedule A.

Please note that the allowable amount of a non-cash deduction depends on whether the property is ordinary income or capital gain property. Ordinary income property is property that if sold would generate ordinary income or short-term capital gain. Examples are clothing, household items, or inventory and capital assets held less than 1 year. Capital gain property results in a long-term gain if sold. An example of this would be real property used for a taxpayer business or corporate stock held more than 1 year. The total charitable deduction is generally limited to no more than 50 percent of AGI. This amount can be reduced to 30 percent or 20 percent, depending on the type of property donated and the type of charitable organization. The statistics for this article include the entire deduction amount reported by taxpayers and transcribed from Form 8283 to line 16 of Schedule A. The limitations are then applied to the amount reported on line 18 of that schedule.

Donated property types:

- **Accessories**—Includes belts, jewelry, and purses.
- **Art and Collectibles**—Includes sculptures, photography, paintings, memorabilia, and jewelry.
- **Cars**—Includes cars and trucks.
- **Clothing**—Includes coats, shoes, etc.

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- *Conservation Easements*—Includes land and right of way easements.
- *Corporate Stock*—Includes shares of publicly traded and closely held common stock and stock rights.
- *Electronics*—Includes televisions, DVD players, video games, fax machines, and computer systems.
- *Façade Easements*—Includes real estate easements and historical preservation easements.
- *Food*—Includes wine, vitamins, snacks, restaurant coupons, and catering.
- *Household Items*—Includes books, appliances, exercise equipment, furniture, and toys.
- *Intellectual Property*—Includes patents, copyrights, trademarks, trade names, and trade secrets.
- *Land*—Includes farms and open lots.
- *Mutual Funds*—Includes shares of taxable and nontaxable mutual funds.
- *Other Investments*—Includes partnerships, real estate investment trusts, bonds, futures, and life insurance policies.
- *Other Vehicles*—Includes planes and boats.
- *Real Estate*—Includes buildings, cabins, commercial property, and building rentals.
- *Services*—Includes catering services and other professional services.
- *Other*—Includes airline tickets and miles, other tickets, medical equipment, horses, musical instruments, building materials, etc.

Donee types (organizations):

- *Arts, Culture, and Humanities*—Includes organizations involved with the arts, music, history, and

cultural activities, such as museums, libraries, science centers, and theaters.

- *Donor-Advised Funds*—A segregated fund within a public charity that permits the donor to have advisory privileges on distributions or investments. Donations to donor-advised funds may be understated.
- *Educational Institutions*—Includes organizations whose primary function is educational, such as schools, universities, fraternities, and scholarship funds.
- *Environmental and Animal Organizations*—Includes organizations that protect, promote, or seek to improve the environment or welfare of animals, such as local animal shelters, botanical gardens, and garden clubs.
- *Foundations*—A foundation is a type of philanthropic organization set up by individuals or institutions as a legal entity (usually either a corporation or trust) with the purpose of distributing grants to support causes in line with the goal of the foundation. For the purpose of this study, this includes family foundations which are specific to a person or family and other private foundations which are community foundations.
- *Health and Medical Research*—Includes hospitals, medical associations, nursing homes, and hospices.
- *Large Organizations*—Includes large national and international organizations that have local chapters, such as Goodwill Industries International, International Committee of the Red Cross, The Salvation Army, United Way International, Habitat for Humanity International, and Boy Scouts of America.
- *Other*—Includes all other organizations that are not included in any other category.
- *Public or Societal Benefit*—These are organizations that benefit individuals or communities, and do not meet the conditions of other categories, such as education, health, and religion. These

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include homeless shelters, food banks, and political think tanks.

- *Religious Organizations*—Includes churches, synagogues, and book stores and thrift stores run by religious organizations.

Data Sources and Limitations

These statistics are based on a sample of individual income tax returns (Forms 1040, 1040A, and 1040EZ, including electronically filed returns) filed during Calendar Year 2006. Returns in the sample were stratified based on: (1) the larger of positive income or negative income (absolute value); (2) the size of business and farm receipts; (3) the presence or absence of specific forms or schedules; and (4) the usefulness of returns for tax policy modeling purposes.⁴ Returns were then selected at rates ranging

from 0.10 percent to 100 percent. The Tax Year 2005 data are based on a sample of 292,966 returns and an estimated final population of 134,494,440 returns.⁵ The number of returns in the sample with Form 8283 was 41,720.

Since the data presented here are estimates based on a sample of returns filed, they are subject to sampling error. To properly use the statistical data provided, the magnitude of the potential sampling error must be known; coefficients of variation (CVs) are used to measure that magnitude. Figure J shows estimated CVs for the numbers of returns and money amounts for selected income items. The reliability of estimates based on samples, and the use of coefficients of variation for evaluating the precision of estimates based on samples, are discussed in “SOI Sampling Methodology and Data Limitations” later in this issue of the *Bulletin*.

Figure J

Individual Noncash Charitable Contributions: Coefficients of Variation for Selected Items, by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

[Coefficients of variation are in percentages]

Size of adjusted gross income	Number of returns	Donor's cost	Amount carried to Schedule A	Fair market value
	(1)	(2)	(3)	(4)
All returns	1.00	1.95	2.21	2.54
Under \$25,000 (including deficits)	4.99	7.48	7.99	12.38
\$25,000 under \$50,000	3.16	4.73	5.22	5.22
\$50,000 under \$75,000	2.65	4.41	7.80	7.80
\$75,000 under \$100,000	2.64	4.54	4.13	4.13
\$100,000 under \$200,000	1.79	2.97	5.52	5.50
\$200,000 under \$500,000	1.79	4.12	11.64	11.65
\$500,000 under \$1,000,000	2.20	22.74	7.03	12.32
\$1,000,000 under \$1,500,000	2.54	14.74	16.29	20.11
\$1,500,000 under \$2,000,000	2.02	12.40	29.40	26.34
\$2,000,000 under \$5,000,000	1.11	6.64	4.74	6.03
\$5,000,000 under \$10,000,000	0.98	4.97	1.56	2.31
\$10,000,000 or more	0.00	0.00	0.00	0.00

⁴ Returns in the sample were stratified based on the presence or absence of one or more of the following forms or schedules: Form 2555, *Foreign Earned Income*; Form 1116, *Foreign Tax Credit (Individual, Fiduciary, or Nonresident Alien Individual)*; Schedule C, *Profit or Loss From Business (Sole Proprietorship)*; and Schedule F, *Profit or Loss From Farming*.

⁵ For further details on the description of the sample, see *Statistics of Income—2005, Individual Income Tax Returns* (IRS Publication 1304).

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Table 1a. Individual Noncash Charitable Contributions: All Returns with Donations, All Donation Types, by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	6,559,140	16,465,082	43,815,301	49,011,733	41,070,632
Under \$25,000 (including deficits)	301,505	641,962	1,510,972	1,077,849	923,549
\$25,000 under \$50,000	851,071	1,821,840	4,346,792	1,926,085	1,926,085
\$50,000 under \$75,000	1,206,015	2,894,841	6,230,063	2,648,511	2,648,338
\$75,000 under \$100,000	1,227,279	3,048,727	6,249,125	2,446,824	2,446,824
\$100,000 under \$200,000	2,066,716	5,429,824	12,519,280	5,549,153	5,451,006
\$200,000 under \$500,000	684,658	1,930,518	5,631,824	5,171,355	4,570,700
\$500,000 under \$1,000,000	135,385	417,141	2,459,440	3,053,105	2,140,922
\$1,000,000 under \$1,500,000	34,558	98,270	826,829	2,893,561	2,044,341
\$1,500,000 under \$2,000,000	15,286	46,019	439,374	2,518,388	1,591,485
\$2,000,000 under \$5,000,000	24,287	79,707	1,012,477	4,837,998	3,717,494
\$5,000,000 under \$10,000,000	6,995	25,476	655,024	3,260,269	2,467,162
\$10,000,000 or more	5,385	30,756	1,934,100	13,628,634	11,142,727

Footnotes at end of table 1j.

Table 1b. Individual Noncash Charitable Contributions: Returns with Donations of Corporate Stock, Mutual Funds, and Other Investments, by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	193,782	418,759	3,779,993	19,760,536	18,583,331
Under \$25,000 (including deficits)	2,648	6,191	24,397	111,840	110,277
\$25,000 under \$50,000	6,872	17,876	27,403	65,364	65,364
\$50,000 under \$75,000	11,351	18,097	51,194	96,082	96,082
\$75,000 under \$100,000	20,565	29,197	58,643	116,874	116,874
\$100,000 under \$200,000	45,978	83,937	168,638	640,752	639,255
\$200,000 under \$500,000	53,771	113,237	324,157	1,553,535	1,423,197
\$500,000 under \$1,000,000	23,030	58,283	764,211	1,098,184	1,042,631
\$1,000,000 under \$1,500,000	8,692	22,658	201,340	1,019,972	968,268
\$1,500,000 under \$2,000,000	4,574	12,211	131,685	1,000,301	961,615
\$2,000,000 under \$5,000,000	9,474	29,478	419,708	2,422,716	2,305,651
\$5,000,000 under \$10,000,000	3,445	11,649	309,682	1,899,294	1,776,498
\$10,000,000 or more	3,382	15,943	1,298,935	9,735,621	9,077,619

Footnotes at end of table 1j.

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Table 1c. Individual Noncash Charitable Contributions: Returns with Donations of Real Estate and Easements, by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	20,751	22,119	2,639,030	12,674,293	6,222,394
Under \$25,000 (including deficits)	1,532	1,545	23,786	242,289	152,926
\$25,000 under \$50,000	* 1,303	* 1,304	* 58,574	* 42,310	* 42,310
\$50,000 under \$75,000	* 2,284	* 2,284	* 41,370	* 295,896	* 295,724
\$75,000 under \$100,000	* 1,329	* 1,329	* 8,916	* 25,220	* 25,220
\$100,000 under \$200,000	3,639	3,680	111,950	457,937	361,316
\$200,000 under \$500,000	5,469	5,844	399,566	1,511,838	1,042,814
\$500,000 under \$1,000,000	1,625	1,825	495,385	1,314,667	481,935
\$1,000,000 under \$1,500,000	1,142	1,269	310,317	1,575,376	781,200
\$1,500,000 under \$2,000,000	541	675	129,992	1,358,603	507,510
\$2,000,000 under \$5,000,000	1,075	1,302	366,906	1,922,088	956,808
\$5,000,000 under \$10,000,000	417	521	215,558	1,043,297	440,259
\$10,000,000 or more	395	540	476,710	2,884,772	1,134,375

Footnotes at end of table 1j.

Table 1d. Individual Noncash Charitable Contributions: Returns with Donations of Art and Collectibles, by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	110,632	178,391	558,908	1,460,637	1,244,906
Under \$25,000 (including deficits)	6,302	7,354	14,152	116,858	53,533
\$25,000 under \$50,000	13,738	17,575	57,692	56,641	56,641
\$50,000 under \$75,000	15,636	21,349	43,348	36,081	36,081
\$75,000 under \$100,000	12,330	20,658	11,723	25,572	25,572
\$100,000 under \$200,000	40,629	53,208	164,451	262,573	262,568
\$200,000 under \$500,000	15,527	38,494	65,372	186,674	185,925
\$500,000 under \$1,000,000	3,227	5,576	81,641	125,614	103,444
\$1,000,000 under \$1,500,000	1,084	1,922	11,917	28,435	26,671
\$1,500,000 under \$2,000,000	639	2,434	22,161	57,770	42,165
\$2,000,000 under \$5,000,000	925	3,144	18,139	118,183	110,128
\$5,000,000 under \$10,000,000	317	901	26,227	103,710	54,158
\$10,000,000 or more	279	5,777	42,084	342,527	288,018

Footnotes at end of table 1j.

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Table 1e. Individual Noncash Charitable Contributions: Returns with Donations of Food, by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	195,807	271,088	123,722	110,618	105,870
Under \$25,000 (including deficits)	7,392	11,236	1,720	4,306	4,304
\$25,000 under \$50,000	14,058	17,784	9,835	8,933	8,933
\$50,000 under \$75,000	35,320	46,152	40,977	13,513	13,513
\$75,000 under \$100,000	38,357	48,047	19,458	27,022	27,022
\$100,000 under \$200,000	71,133	107,703	27,510	30,355	30,355
\$200,000 under \$500,000	22,363	30,904	10,052	10,391	10,391
\$500,000 under \$1,000,000	4,401	5,386	3,318	4,054	4,054
\$1,000,000 under \$1,500,000	1,146	1,406	924	733	733
\$1,500,000 under \$2,000,000	521	678	3,367	4,655	813
\$2,000,000 under \$5,000,000	748	1,095	3,221	2,294	2,284
\$5,000,000 under \$10,000,000	208	286	1,020	1,426	788
\$10,000,000 or more	159	410	2,321	2,936	2,681

Footnotes at end of table 1j.

Table 1f. Individual Noncash Charitable Contributions: Returns with Donations of Clothing and Accessories, by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	4,743,682	8,376,687	19,959,181	7,084,757	7,080,266
Under \$25,000 (including deficits)	208,200	319,363	822,671	315,354	315,308
\$25,000 under \$50,000	579,873	934,370	2,305,574	944,958	944,958
\$50,000 under \$75,000	860,317	1,483,561	3,188,269	1,177,506	1,177,506
\$75,000 under \$100,000	930,139	1,634,099	3,470,142	1,301,611	1,301,611
\$100,000 under \$200,000	1,554,822	2,789,246	6,548,098	2,195,940	2,195,940
\$200,000 under \$500,000	479,776	955,926	2,715,875	867,241	867,241
\$500,000 under \$1,000,000	86,930	181,388	543,916	175,336	175,336
\$1,000,000 under \$1,500,000	19,369	35,212	148,999	41,078	41,078
\$1,500,000 under \$2,000,000	8,306	15,228	56,237	18,197	18,160
\$2,000,000 under \$5,000,000	11,681	20,752	85,769	27,251	27,168
\$5,000,000 under \$10,000,000	2,718	4,797	57,016	7,951	7,948
\$10,000,000 or more	1,550	2,743	16,613	12,334	8,013

Footnotes at end of table 1j.

Individual Noncash Contributions, 2005

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Table 1g. Individual Noncash Charitable Contributions: Returns with Donations of Electronics, by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	517,625	622,628	1,119,935	474,505	474,505
Under \$25,000 (including deficits)	20,662	22,446	56,521	24,991	24,991
\$25,000 under \$50,000	62,642	78,120	145,002	79,440	79,440
\$50,000 under \$75,000	99,162	117,587	220,388	83,561	83,561
\$75,000 under \$100,000	96,342	112,684	134,990	65,715	65,715
\$100,000 under \$200,000	167,393	200,459	361,620	137,314	137,314
\$200,000 under \$500,000	57,433	73,246	147,900	62,730	62,730
\$500,000 under \$1,000,000	9,351	12,592	35,217	13,021	13,021
\$1,000,000 under \$1,500,000	1,944	2,279	7,405	2,634	2,634
\$1,500,000 under \$2,000,000	940	1,140	3,096	1,265	1,265
\$2,000,000 under \$5,000,000	1,249	1,463	5,321	2,519	2,519
\$5,000,000 under \$10,000,000	302	350	1,002	460	460
\$10,000,000 or more	206	263	1,473	855	855

Footnotes at end of table 1j.

Table 1h. Individual Noncash Charitable Contributions: Returns with Donations of Household Items, by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	2,864,635	5,000,319	11,152,477	3,860,090	3,858,494
Under \$25,000 (including deficits)	115,388	187,704	400,293	157,225	157,225
\$25,000 under \$50,000	352,341	569,910	1,250,138	507,456	507,456
\$50,000 under \$75,000	550,044	921,480	2,059,084	705,131	705,131
\$75,000 under \$100,000	541,013	916,725	1,851,312	595,070	595,070
\$100,000 under \$200,000	927,043	1,704,470	3,567,390	1,206,687	1,206,679
\$200,000 under \$500,000	297,302	543,435	1,485,510	493,896	493,353
\$500,000 under \$1,000,000	54,304	109,211	339,407	113,304	113,304
\$1,000,000 under \$1,500,000	12,482	21,308	81,058	27,167	27,167
\$1,500,000 under \$2,000,000	4,970	8,695	39,410	13,447	13,116
\$2,000,000 under \$5,000,000	6,914	12,393	53,669	26,139	26,139
\$5,000,000 under \$10,000,000	1,784	3,130	13,550	6,513	6,414
\$10,000,000 or more	1,051	1,858	11,653	8,055	7,439

Footnotes at end of table 1j.

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Table 1i. Individual Noncash Charitable Contributions: Returns with Donations of Cars and Other Vehicles, by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	309,877	325,372	2,372,265	621,988	610,317
Under \$25,000 (including deficits)	11,250	13,224	64,964	14,474	14,474
\$25,000 under \$50,000	48,859	52,501	267,394	66,767	66,767
\$50,000 under \$75,000	63,950	65,894	369,396	82,791	82,791
\$75,000 under \$100,000	56,506	59,507	387,007	89,075	89,075
\$100,000 under \$200,000	96,849	100,953	775,166	147,514	147,514
\$200,000 under \$500,000	25,472	25,759	307,986	72,834	72,833
\$500,000 under \$1,000,000	4,738	5,096	109,532	52,353	52,271
\$1,000,000 under \$1,500,000	908	925	34,027	34,324	34,230
\$1,500,000 under \$2,000,000	411	430	9,099	12,231	3,665
\$2,000,000 under \$5,000,000	620	730	19,963	18,070	16,150
\$5,000,000 under \$10,000,000	177	195	4,979	8,184	7,450
\$10,000,000 or more	138	159	22,754	23,370	23,096

Footnotes at end of table 1j.

Table 1j. Individual Noncash Charitable Contributions: Returns with Other Donations, by Size of Adjusted Gross Income, Form 8283, Tax Year 2005 [3]

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	810,810	1,249,720	2,109,791	2,964,308	2,890,549
Under \$25,000 (including deficits)	45,511	72,898	102,468	90,511	90,511
\$25,000 under \$50,000	100,989	132,399	225,180	154,217	154,217
\$50,000 under \$75,000	133,694	218,438	216,037	157,949	157,949
\$75,000 under \$100,000	133,076	226,482	306,934	200,665	200,665
\$100,000 under \$200,000	259,295	386,169	794,457	470,081	470,064
\$200,000 under \$500,000	96,096	143,673	175,406	412,217	412,217
\$500,000 under \$1,000,000	22,892	37,784	86,813	156,573	154,926
\$1,000,000 under \$1,500,000	7,389	11,290	30,841	163,842	162,360
\$1,500,000 under \$2,000,000	3,019	4,528	44,326	51,917	43,176
\$2,000,000 under \$5,000,000	5,358	9,349	39,781	298,740	270,647
\$5,000,000 under \$10,000,000	1,833	3,648	25,991	189,434	173,188
\$10,000,000 or more	1,658	3,063	61,557	618,163	600,631

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

[1] Not every donation has a donor cost. The total donor cost is based on 8.9 million out of 16.4 million donations.

[2] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of \$5,000 or less or publicly traded securities) plus the lesser of the fair market value claimed on Section B (items with a deduction of more than \$5,000).

[3] Other donations includes intellectual property, services, and airline tickets and miles.

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Table 2a. Individual Noncash Charitable Contributions: All Donee Types, by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	6,559,140	16,465,082	43,815,301	49,011,733	41,070,632
Under \$25,000 (including deficits)	301,505	641,962	1,510,972	1,077,849	923,549
\$25,000 under \$50,000	851,071	1,821,840	4,346,792	1,926,085	1,926,085
\$50,000 under \$75,000	1,206,015	2,894,841	6,230,063	2,648,511	2,648,338
\$75,000 under \$100,000	1,227,279	3,048,727	6,249,125	2,446,824	2,446,824
\$100,000 under \$200,000	2,066,716	5,429,824	12,519,280	5,549,153	5,451,006
\$200,000 under \$500,000	684,658	1,930,518	5,631,824	5,171,355	4,570,700
\$500,000 under \$1,000,000	135,385	417,141	2,459,440	3,053,105	2,140,922
\$1,000,000 under \$1,500,000	34,558	98,270	826,829	2,893,561	2,044,341
\$1,500,000 under \$2,000,000	15,286	46,019	439,374	2,518,388	1,591,485
\$2,000,000 under \$5,000,000	24,287	79,707	1,012,477	4,837,998	3,717,494
\$5,000,000 under \$10,000,000	6,995	25,476	655,024	3,260,269	2,467,162
\$10,000,000 or more	5,385	30,756	1,934,100	13,628,634	11,142,727

Footnotes at end of Table 2k.

Table 2b. Individual Noncash Charitable Contributions: Donee Types (Arts, Culture, and Humanities), by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	235,690	326,247	540,370	1,539,462	1,338,311
Under \$25,000 (including deficits)	10,800	15,305	20,573	119,723	56,399
\$25,000 under \$50,000	15,144	20,330	66,287	56,718	56,718
\$50,000 under \$75,000	39,088	50,910	51,201	40,957	40,957
\$75,000 under \$100,000	43,200	53,635	47,062	47,966	47,966
\$100,000 under \$200,000	74,165	107,084	90,744	76,384	76,380
\$200,000 under \$500,000	36,126	47,229	73,758	102,589	98,723
\$500,000 under \$1,000,000	9,140	14,084	37,419	77,113	76,713
\$1,000,000 under \$1,500,000	2,607	4,280	18,573	52,314	49,812
\$1,500,000 under \$2,000,000	1,383	3,500	15,054	89,471	56,409
\$2,000,000 under \$5,000,000	2,492	5,288	28,112	203,513	176,106
\$5,000,000 under \$10,000,000	816	1,668	36,665	159,804	110,456
\$10,000,000 or more	729	2,932	54,920	512,910	491,673

Footnotes at end of Table 2k.

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Table 2c. Individual Noncash Charitable Contributions: Donee Types (Educational Institutions), by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	343,200	482,988	1,965,539	4,756,457	4,160,844
Under \$25,000 (including deficits)	10,000	15,151	11,513	72,905	71,364
\$25,000 under \$50,000	26,202	31,059	30,286	53,453	53,453
\$50,000 under \$75,000	50,789	58,912	85,827	47,387	47,387
\$75,000 under \$100,000	46,041	61,278	65,001	66,687	66,687
\$100,000 under \$200,000	118,825	152,598	333,137	368,500	367,007
\$200,000 under \$500,000	57,463	96,862	197,686	765,281	474,015
\$500,000 under \$1,000,000	16,908	30,749	681,767	429,925	387,115
\$1,000,000 under \$1,500,000	5,271	8,610	75,114	246,812	235,361
\$1,500,000 under \$2,000,000	2,780	4,827	20,491	147,271	123,192
\$2,000,000 under \$5,000,000	5,514	10,917	150,168	736,211	626,054
\$5,000,000 under \$10,000,000	1,812	4,178	89,675	408,520	359,485
\$10,000,000 or more	1,597	7,846	224,875	1,413,504	1,349,724

Footnotes at end of Table 2k.

Table 2d. Individual Noncash Charitable Contributions: Donee Types (Environmental and Animal-Related Organizations), by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	106,106	129,314	1,434,091	7,009,538	3,348,537
Under \$25,000 (including deficits)	5,212	5,262	28,018	68,425	66,220
\$25,000 under \$50,000	8,697	15,726	10,119	6,955	6,955
\$50,000 under \$75,000	16,864	17,821	33,407	13,336	13,336
\$75,000 under \$100,000	19,780	21,774	43,097	20,423	20,423
\$100,000 under \$200,000	33,505	41,810	183,557	426,474	409,422
\$200,000 under \$500,000	15,103	16,059	284,884	973,431	829,509
\$500,000 under \$1,000,000	3,381	5,553	321,607	947,644	286,506
\$1,000,000 under \$1,500,000	1,219	1,601	134,936	1,063,624	403,956
\$1,500,000 under \$2,000,000	570	1,002	35,857	920,863	309,826
\$2,000,000 under \$5,000,000	1,046	1,506	124,153	770,860	287,178
\$5,000,000 under \$10,000,000	383	573	69,692	462,556	142,434
\$10,000,000 or more	346	626	164,765	1,334,948	572,773

Footnotes at end of Table 2k.

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Table 2e. Individual Noncash Charitable Contributions: Donee Types (Health and Medical Research), by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	919,940	1,334,696	3,106,664	1,757,801	1,611,826
Under \$25,000 (including deficits)	31,930	44,014	135,126	58,498	58,179
\$25,000 under \$50,000	92,798	112,712	209,367	98,307	98,307
\$50,000 under \$75,000	144,933	215,976	530,275	155,040	155,040
\$75,000 under \$100,000	182,909	253,171	464,487	174,928	174,928
\$100,000 under \$200,000	324,988	479,985	1,045,329	370,243	336,950
\$200,000 under \$500,000	103,807	158,437	393,497	194,518	194,240
\$500,000 under \$1,000,000	24,595	48,399	134,338	100,626	89,575
\$1,000,000 under \$1,500,000	5,553	8,538	38,005	54,610	48,001
\$1,500,000 under \$2,000,000	2,489	3,583	19,375	77,830	48,270
\$2,000,000 under \$5,000,000	3,988	6,350	43,865	120,664	103,184
\$5,000,000 under \$10,000,000	1,128	1,961	25,751	87,062	66,702
\$10,000,000 or more	822	1,570	67,248	265,476	238,449

Footnotes at end of Table 2k.

Table 2f. Individual Noncash Charitable Contributions: Donee Types (Large Organizations), by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	4,931,660	9,573,536	23,499,089	8,555,114	8,472,212
Under \$25,000 (including deficits)	210,258	356,854	844,682	331,380	331,334
\$25,000 under \$50,000	624,808	1,127,227	2,846,278	1,152,995	1,152,995
\$50,000 under \$75,000	918,321	1,765,918	3,965,600	1,438,061	1,438,061
\$75,000 under \$100,000	957,200	1,838,169	4,215,178	1,461,286	1,461,286
\$100,000 under \$200,000	1,571,944	3,144,062	7,518,048	2,557,327	2,523,562
\$200,000 under \$500,000	515,029	1,066,230	3,106,630	1,044,311	1,037,648
\$500,000 under \$1,000,000	89,693	192,042	597,019	220,274	220,274
\$1,000,000 under \$1,500,000	20,111	37,723	157,576	74,805	73,630
\$1,500,000 under \$2,000,000	8,240	15,419	89,037	30,768	29,850
\$2,000,000 under \$5,000,000	11,601	21,831	109,810	130,919	100,223
\$5,000,000 under \$10,000,000	2,822	5,051	23,316	46,128	40,742
\$10,000,000 or more	1,634	3,011	25,916	66,860	62,607

Footnotes at end of Table 2k.

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Table 2g. Individual Noncash Charitable Contributions: Donee Types (Public and Societal Benefit), by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	1,266,610	1,884,312	4,506,707	3,461,870	2,746,584
Under \$25,000 (including deficits)	57,872	87,402	193,384	82,108	81,445
\$25,000 under \$50,000	156,042	215,990	498,007	216,512	216,512
\$50,000 under \$75,000	238,268	349,558	629,527	320,179	320,179
\$75,000 under \$100,000	233,412	352,492	589,182	229,119	229,119
\$100,000 under \$200,000	393,784	599,738	1,362,353	517,634	517,614
\$200,000 under \$500,000	140,441	205,898	641,150	414,501	391,134
\$500,000 under \$1,000,000	29,362	45,392	150,064	267,695	180,227
\$1,000,000 under \$1,500,000	6,852	11,101	58,877	87,464	75,849
\$1,500,000 under \$2,000,000	3,287	4,729	58,372	162,614	71,793
\$2,000,000 under \$5,000,000	4,982	7,915	110,869	485,710	263,678
\$5,000,000 under \$10,000,000	1,333	2,335	94,432	191,369	114,373
\$10,000,000 or more	973	1,762	120,489	486,966	284,658

Footnotes at end of Table 2k.

Table 2h. Individual Noncash Charitable Contributions: Donee Types (Religious Organizations), by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	1,257,036	1,904,357	4,676,083	5,009,122	4,506,943
Under \$25,000 (including deficits)	58,500	78,543	162,780	103,603	102,903
\$25,000 under \$50,000	143,798	217,173	511,077	241,703	241,703
\$50,000 under \$75,000	214,319	303,161	651,828	442,026	442,026
\$75,000 under \$100,000	236,116	347,118	674,635	304,432	304,432
\$100,000 under \$200,000	407,563	638,936	1,331,483	686,578	681,019
\$200,000 under \$500,000	143,682	231,967	619,497	724,414	608,123
\$500,000 under \$1,000,000	31,683	51,209	230,185	394,548	344,514
\$1,000,000 under \$1,500,000	8,992	13,964	202,795	468,112	399,289
\$1,500,000 under \$2,000,000	3,776	6,548	52,844	188,826	123,036
\$2,000,000 under \$5,000,000	6,004	10,821	84,644	407,323	381,290
\$5,000,000 under \$10,000,000	1,577	2,916	43,597	329,977	317,767
\$10,000,000 or more	1,027	2,002	110,720	717,577	560,840

Footnotes at end of Table 2k.

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Table 2i. Individual Noncash Charitable Contributions: Donee Types (Donor-Advised Funds), by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	17,573	28,608	283,159	1,752,212	1,614,979
Under \$25,000 (including deficits)	704	2,008	9,972	11,385	11,385
\$25,000 under \$50,000	* 1,673	* 1,673	* 6,395	* 10,305	* 10,305
\$50,000 under \$75,000	* 999	* 1,998	* 42,075	* 55,008	* 55,008
\$75,000 under \$100,000	* 978	* 978	* 212	* 8,818	* 8,818
\$100,000 under \$200,000	3,090	4,007	13,822	54,513	54,513
\$200,000 under \$500,000	3,862	5,976	20,306	127,715	127,715
\$500,000 under \$1,000,000	2,623	4,177	21,337	104,172	104,089
\$1,000,000 under \$1,500,000	1,042	2,199	9,651	92,842	82,060
\$1,500,000 under \$2,000,000	552	902	6,212	44,582	44,582
\$2,000,000 under \$5,000,000	1,179	2,348	37,106	243,259	200,635
\$5,000,000 under \$10,000,000	448	1,040	57,018	198,429	137,371
\$10,000,000 or more	422	1,303	59,052	801,184	778,499

Footnotes at end of Table 2k.

Table 2j. Individual Noncash Charitable Contributions: Donee Types (Foundations), by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	147,717	203,997	2,200,134	11,224,716	9,811,124
Under \$25,000 (including deficits)	4,143	4,536	14,590	52,278	52,278
\$25,000 under \$50,000	11,651	13,306	38,617	20,040	20,040
\$50,000 under \$75,000	23,242	28,382	61,633	44,423	44,250
\$75,000 under \$100,000	27,694	33,014	69,656	59,224	59,224
\$100,000 under \$200,000	41,742	63,775	137,810	109,205	102,399
\$200,000 under \$500,000	21,618	27,449	137,151	521,171	507,350
\$500,000 under \$1,000,000	6,865	8,894	127,445	353,336	295,208
\$1,000,000 under \$1,500,000	2,796	4,261	103,387	523,843	514,983
\$1,500,000 under \$2,000,000	1,430	2,462	66,875	248,953	191,316
\$2,000,000 under \$5,000,000	3,179	6,878	268,523	1,276,160	1,200,975
\$5,000,000 under \$10,000,000	1,522	3,611	177,626	1,023,613	912,510
\$10,000,000 or more	1,836	7,428	996,821	6,992,471	5,910,590

Footnotes at end of Table 2k.

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Table 2k. Individual Noncash Charitable Contributions: Donee Types (Other), by Size of Adjusted Gross Income, Form 8283, Tax Year 2005

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

Size of adjusted gross income	All returns				
	Number of returns	Number of donations	Donor's cost [1]	Fair market value	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)
All returns	471,373	597,028	1,603,465	3,945,441	3,459,273
Under \$25,000 (including deficits)	29,500	32,886	90,335	177,544	92,041
\$25,000 under \$50,000	55,329	66,644	130,357	69,096	69,096
\$50,000 under \$75,000	79,862	102,205	178,691	92,094	92,094
\$75,000 under \$100,000	66,650	87,097	80,614	73,941	73,941
\$100,000 under \$200,000	155,229	197,830	502,998	382,295	382,140
\$200,000 under \$500,000	58,001	74,410	157,266	303,425	302,244
\$500,000 under \$1,000,000	13,359	16,642	158,257	157,774	156,702
\$1,000,000 under \$1,500,000	4,538	5,994	27,916	229,135	161,400
\$1,500,000 under \$2,000,000	2,244	3,047	75,259	607,211	593,211
\$2,000,000 under \$5,000,000	3,929	5,853	55,225	463,379	378,170
\$5,000,000 under \$10,000,000	1,420	2,143	37,253	352,812	265,323
\$10,000,000 or more	1,312	2,276	109,295	1,036,737	892,913

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

[1] Not every donation has a donor cost. The total donor cost is based on 8.9 million out of 16.4 million donations.

[2] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of \$5,000 or less or publicly traded securities) plus the lesser of the fair market value or amount claimed on Section B (items with a deduction of more than \$5,000).

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Table 3. Individual Noncash Charitable Contributions: All Returns with Donations, by Donation Types and Donee Types, Form 8283, Tax Year 2005

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

Type of donation	Total		Arts, culture, and humanities		Educational institutions
	Number of donations	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]	Number of donations
	(1)	(2)	(3)	(4)	(5)
All returns	16,465,082	41,070,632	326,247	1,338,311	482,988
Corporate stock, mutual funds, and other investments	418,759	18,583,331	23,439	556,078	89,907
Real estate and easements	22,119	6,222,394	1,447	73,172	1,801
Art and collectibles	178,391	1,244,906	32,288	549,636	41,902
Food	271,088	105,870	3,873	814	24,561
Clothing and accessories	8,376,687	7,080,266	13,392	11,697	81,651
Electronics	622,628	474,505	8,898	2,885	29,620
Household items	5,000,319	3,858,494	212,388	82,335	110,307
Cars and other vehicles	325,372	610,317	1,566	11,246	19,152
Other [2]	1,249,720	2,890,549	28,956	50,446	84,087

Type of donation	Educational institutions—continued	Environment and animals		Health and medical research	
	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]
	(6)	(7)	(8)	(9)	(10)
All returns	4,160,844	129,314	3,348,537	1,334,696	1,611,826
Corporate stock, mutual funds, and other investments	2,897,087	20,097	335,203	17,194	484,618
Real estate and easements	521,372	3,448	2,771,490	848	86,953
Art and collectibles	307,462	3,864	82,440	12,033	19,610
Food	6,882	3,151	915	6,561	1,872
Clothing and accessories	56,198	26,388	19,720	748,731	528,269
Electronics	23,746	7,315	1,971	34,444	30,086
Household items	92,293	31,470	25,746	325,383	246,837
Cars and other vehicles	50,669	6,238	65,959	77,864	89,244
Other [2]	205,136	27,345	45,093	111,638	124,339

Type of donation	Large organizations		Public and societal benefit		Religious organizations
	Number of donations	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]	Number of donations
	(11)	(12)	(13)	(14)	(15)
All returns	9,573,536	8,472,212	1,884,312	2,746,584	1,904,357
Corporate stock, mutual funds, and other investments	33,587	264,480	17,120	349,276	121,390
Real estate and easements	631	61,355	3,655	916,990	6,177
Art and collectibles	32,711	40,889	18,487	49,281	19,978
Food	38,574	12,359	89,918	36,166	82,647
Clothing and accessories	5,614,702	4,907,299	871,420	652,898	792,053
Electronics	349,356	271,400	75,799	48,839	81,176
Household items	3,002,667	2,449,664	572,929	376,752	559,679
Cars and other vehicles	68,011	86,105	79,196	120,815	48,929
Other [2]	433,295	378,660	155,789	195,568	192,328

Type of donation	Religious organizations—continued	Foundations		Other donees [3]	
	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]
	(16)	(17)	(18)	(19)	(20)
All returns	4,506,943	203,997	9,811,124	625,636	5,074,251
Corporate stock, mutual funds, and other investments	2,085,562	54,106	8,931,413	41,919	2,679,615
Real estate and easements	872,736	669	428,930	3,442	489,396
Art and collectibles	70,417	5,086	66,406	12,042	58,766
Food	22,250	3,246	1,194	18,558	23,418
Clothing and accessories	686,506	58,956	53,068	169,393	164,612
Electronics	70,549	9,690	4,984	26,329	20,046
Household items	416,318	46,106	37,274	139,389	131,276
Cars and other vehicles	90,059	7,164	52,279	17,253	43,941
Other [2]	192,548	18,973	235,577	197,310	1,463,183

[1] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of \$5,000 or less or publicly-traded securities) plus the lesser of the fair market value or amount claimed on Section B (items with a deduction of more than \$5,000).

[2] Other donations include intellectual property, services, and tickets and airline miles.

[3] Other donees includes donor-advised funds.

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Table 4. Individual Noncash Charitable Contributions: All Returns with Donations, by Donation Types and Donor Age, Form 8283, Tax Year 2005

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

Donor age	Total							
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns with contributions on Schedule A	Amount of contributions on Schedule A	Number of returns on Schedule A with cash contributions	Amount of cash contributions on Schedule A
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All ages	6,559,140	16,465,082	49,011,733	41,070,632	6,528,419	40,867,902	6,053,552	30,583,284
Under 35	793,262	1,545,255	2,287,106	2,231,510	790,141	2,122,215	668,197	1,688,893
35 under 45	1,683,889	4,104,940	8,613,907	6,071,559	1,678,398	6,030,407	1,535,461	4,906,539
45 under 55	1,873,519	4,931,399	10,222,743	8,949,908	1,867,419	8,916,911	1,753,877	7,966,096
55 under 65	1,382,485	3,593,844	11,825,399	9,756,707	1,377,653	9,759,799	1,312,001	7,598,431
65 and older	825,984	2,289,643	16,062,579	14,060,948	814,808	14,038,570	784,018	8,423,325
Donor age	Corporate stock, mutual funds, and other investments				Real estate and easements			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All ages	193,782	418,759	19,760,536	18,583,331	20,751	22,119	12,674,293	6,222,394
Under 35	3,876	5,741	323,105	310,732	67	84	301,029	282,936
35 under 45	22,217	34,988	1,783,467	1,540,900	2,169	2,296	3,099,416	820,943
45 under 55	36,628	83,479	3,439,772	3,238,378	4,251	4,537	2,414,215	1,360,794
55 under 65	43,036	85,261	4,129,884	4,070,286	5,254	5,454	3,919,478	2,017,434
65 and older	88,025	209,290	10,084,308	9,423,035	9,010	9,747	2,940,155	1,740,288
Donor age	Art and collectibles				Food			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
All ages	110,632	178,391	1,460,637	1,244,906	195,807	271,088	110,618	105,870
Under 35	4,017	21,635	33,505	32,757	15,719	17,226	5,783	5,783
35 under 45	10,889	13,516	147,002	138,852	40,075	62,970	33,566	30,047
45 under 55	24,624	39,425	180,318	177,061	68,523	99,016	35,408	34,449
55 under 65	41,764	54,438	349,223	269,790	50,026	63,024	26,012	25,742
65 and older	29,338	49,376	750,589	626,446	21,464	28,852	9,849	9,849
Donor age	Clothing and accessories				Electronics			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
All ages	4,743,682	8,376,687	7,084,757	7,080,266	517,625	622,628	474,505	474,505
Under 35	583,137	879,739	893,493	893,493	63,987	69,358	82,574	82,574
35 under 45	1,246,964	2,188,256	1,850,650	1,850,650	121,551	148,922	104,046	104,046
45 under 55	1,388,373	2,567,064	2,094,707	2,092,997	157,146	191,980	136,800	136,800
55 under 65	980,743	1,772,113	1,448,537	1,446,887	109,709	133,353	91,797	91,797
65 and older	544,465	969,515	797,371	796,239	65,232	79,015	59,288	59,288
Donor age	Household items				Cars and other vehicles			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
All ages	2,864,635	5,000,319	3,860,090	3,858,494	309,877	325,372	621,988	610,317
Under 35	295,401	421,587	436,760	436,706	37,021	39,045	68,223	68,223
35 under 45	753,533	1,330,938	1,000,137	1,000,137	66,395	70,848	102,084	101,885
45 under 55	827,529	1,440,490	1,064,186	1,063,511	107,589	113,955	182,236	181,750
55 under 65	629,034	1,125,939	892,652	891,832	65,566	66,846	133,871	124,872
65 and older	359,138	681,365	466,355	466,307	33,306	34,678	135,573	133,587
Donor age					Other [2]			
					Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
					(41)	(42)	(43)	(44)
All ages					810,810	1,249,720	2,964,308	2,890,549
Under 35					72,134	90,840	142,634	118,307
35 under 45					180,449	252,207	493,538	484,098
45 under 55					226,180	391,452	675,100	664,168
55 under 65					187,728	287,415	833,946	818,067
65 and older					144,319	227,805	819,090	805,909

[1] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of \$5,000 or less or publicly traded securities) plus the lesser of the fair market value or amount claimed on Section B (items with a deduction of more than \$5,000).

[2] Other donations include intellectual property, services, and tickets and airline miles.

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Table 5. Individual Noncash Charitable Contributions: All Donations Made to Donee Organizations, by Donor Age, Form 8283, Tax Year 2005

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

Donor age	All returns							
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns with contributions on Schedule A	Amount of contributions on Schedule A	Number of returns on Schedule A with cash contributions	Amount of cash contributions on Schedule A
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All ages	6,559,140	16,465,082	49,011,733	41,070,632	6,528,419	40,867,902	6,053,552	30,583,284
Under 35	793,262	1,545,255	2,287,106	2,231,510	790,141	2,122,215	668,197	1,688,893
35 under 45	1,683,889	4,104,940	8,613,907	6,071,559	1,678,398	6,030,407	1,535,461	4,906,539
45 under 55	1,873,519	4,931,399	10,222,743	8,949,908	1,867,419	8,916,911	1,753,877	7,966,096
55 under 65	1,382,485	3,593,844	11,825,399	9,756,707	1,377,653	9,759,799	1,312,001	7,598,431
65 and older	825,984	2,289,643	16,062,579	14,060,948	814,808	14,038,570	784,018	8,423,325
Donor age	Arts, culture, and humanities				Educational institutions			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All ages	235,690	326,247	1,539,462	1,338,311	343,200	482,988	4,756,457	4,160,844
Under 35	7,263	7,589	12,785	9,557	16,768	38,431	74,676	50,788
35 under 45	32,076	49,451	92,263	69,194	74,109	93,966	487,039	448,811
45 under 55	56,843	71,926	137,790	115,190	99,911	135,951	741,340	656,011
55 under 65	67,560	96,642	391,149	309,470	70,941	97,556	1,089,688	1,005,405
65 and older	71,949	100,639	905,476	834,900	81,471	117,083	2,363,713	1,999,829
Donor age	Environment and animals				Health and medical research			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
All ages	106,106	129,314	7,009,538	3,348,537	919,940	1,334,696	1,757,801	1,611,826
Under 35	7,856	7,860	275,995	264,694	79,291	108,291	135,667	134,608
35 under 45	21,238	21,909	2,464,708	648,578	231,621	317,367	316,911	311,143
45 under 55	31,659	44,510	1,042,622	489,921	292,381	431,982	422,374	358,745
55 under 65	22,048	25,201	1,924,089	1,129,228	192,078	294,595	330,848	315,863
65 and older	23,304	29,834	1,302,124	816,117	124,569	182,461	552,002	491,467
Donor age	Large organizations				Public and societal benefit			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
All ages	4,931,660	9,573,536	8,555,114	8,472,212	1,266,610	1,884,312	3,461,870	2,746,584
Under 35	642,407	1,052,091	1,144,261	1,144,261	109,346	139,114	128,753	128,636
35 under 45	1,298,162	2,507,999	2,099,631	2,099,498	302,067	464,984	642,296	448,370
45 under 55	1,452,590	2,948,636	2,527,396	2,495,377	364,448	561,117	743,592	640,964
55 under 65	1,028,143	2,052,039	1,859,359	1,821,949	290,547	414,840	916,085	679,960
65 and older	510,358	1,012,770	924,467	911,126	200,202	304,258	1,031,145	848,654
Donor age	Religious organizations				Donor-advised funds			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
All ages	1,257,036	1,904,357	5,009,122	4,506,943	17,573	28,608	1,752,212	1,614,979
Under 35	93,173	122,065	136,979	136,309	1,302	1,484	36,066	36,058
35 under 45	289,144	465,311	736,715	623,877	2,590	3,286	457,067	374,083
45 under 55	354,824	508,837	1,532,864	1,372,855	5,294	9,395	474,331	443,528
55 under 65	292,612	419,076	1,167,909	970,334	3,874	6,648	362,804	362,721
65 and older	227,283	389,068	1,434,654	1,403,569	4,513	7,795	421,945	398,589
Donor age	Foundations				Other donees			
	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]	Number of returns	Number of donations	Fair market value	Amount carried to Schedule A [1]
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
All ages	147,717	203,997	11,224,716	9,811,124	471,373	597,028	3,945,441	3,459,273
Under 35	8,920	9,835	226,477	212,237	50,784	58,494	115,447	114,362
35 under 45	30,220	42,917	844,590	684,099	112,363	137,751	472,686	363,906
45 under 55	45,761	60,989	1,852,263	1,740,041	116,793	158,055	748,171	637,276
55 under 65	30,780	42,156	2,841,506	2,288,453	111,782	145,092	941,963	873,323
65 and older	32,036	48,099	5,459,880	4,886,293	79,651	97,636	1,667,173	1,470,405

[1] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of \$5,000 or less or publicly-traded securities) plus the lesser of the fair market value or amount claimed on Section B (items with a deduction of more than \$5,000).

Accumulation and Distribution of Individual Retirement Arrangements, 2004

Victoria L. Bryant

For 2004, individual income taxpayers contributed approximately \$48.7 billion to Individual Retirement Arrangements (IRAs). In addition, \$214.9 billion were reported as rollovers into IRAs for 2004, usually from employer-sponsored plans (such as 401(k) plans).¹ At year-end, approximately 50.9 million taxpayers held \$3.3 trillion in IRAs based on the fair market value.

Almost 90 percent of the year-end fair market value, 89.6 percent, (\$3.0 trillion), was invested in traditional IRA plans (Figure A and Table 1). Simplified Employee Pension (SEP) plans accounted for 5.1 percent (\$169 billion), Roth IRA plans accounted for 4.2 percent (\$140 billion), and Savings Incentive Match Plans for Employees (SIMPLE) plans accounted for 1.0 percent (\$34 billion). Even though traditional IRAs accounted for most of the year-end fair market value, Roth IRA contributions accounted for almost one-third of contributions for the year, 30.2 percent (\$14.7 billion). SEP plans accounted for 28.2 percent (\$13.8 billion) of contributions, traditional IRA plans accounted for 25.9 percent (\$12.6 billion), and SIMPLE plans accounted for 15.6 percent (\$7.6 billion).

For Tax Year 2004, while \$48.7 billion were contributed by 14.7 million taxpayers, 12.3 million taxpayers withdrew \$140 billion, of which \$133 billion were from traditional IRA plans, \$4.5 billion were from SEP plans, \$1.9 billion were from Roth plans, and \$0.2 billion were from SIMPLE plans.

Types of Plans

Traditional IRAs

IRAs were created by the Employee Retirement Income Security Act (ERISA) of 1974. These first retirement accounts, termed traditional IRAs, remained the principal type of retirement account held by taxpayers in 2004. In general, contributions to traditional IRAs could be made by individuals who received taxable compensation (e.g., wages, salaries, commis-

sions, and self-employment income). For 2004, the maximum contribution amount to a traditional IRA was the smaller of \$3,000 or the individual's taxable compensation. For taxpayers age 50 and older, an additional \$500 "catch-up" contribution was allowed. Both contribution limits were legislated by the Economic Growth and Tax Relief Reconciliation Act of 2001 (EGTRRA). Additional restrictions based on age, coverage by a retirement plan at work, income, and filing status limited the amount that could be contributed in any particular tax year and whether the contribution could be deducted from income. In general, taxpayers less than 70 ½ years of age who were not covered by a retirement plan at work could make a traditional IRA contribution that was deductible from his or her income otherwise subject to income tax. However, this deduction would be limited based on income level, filing status, and if the taxpayer's spouse was covered by an employer-sponsored retirement plan. For example, for 2004, a married taxpayer filing jointly had his or her deduction limited when modified adjusted gross income levels were \$160,000 or more and the other spouse had employer coverage.² Before 59 ½ years of age, most withdrawals from traditional IRAs were subject to a 10-percent additional tax. In general, distributions from the plan were required to begin by April 1 of the year following the year in which the taxpayer reached age 70 ½ and were taxed as ordinary income.

Of the 5.3 million taxpayers in 2004 who contributed to a traditional IRA, 3.1 million taxpayers were age 50 or older. Of these 3.1 million taxpayers, 1.6 million taxpayers took advantage of some or all of the catch-up contribution allowance (Table 6), and 96 percent of them took advantage of the entire catch-up contribution allowance and contributed the \$3,500 maximum.

Simplified Employee Pension IRAs

Employer-sponsored Simplified Employee Pension IRAs (SEP-IRAs), introduced in the Revenue Act of 1978, allow employers to make contributions for their employees' retirements. Self-employed individuals could also use a SEP-IRA to contribute to their own retirements. For 2004, an employer could

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¹ See Explanation of Selected Terms.

² See Explanation of Selected Terms.

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Figure A

Taxpayers with IRA Contributions, by Type of Plan, Tax Year 2004

Type of plan	Total contributions			End-of-year fair market value		
	Number	Amount (\$1,000)	Percent	Number	Amount (\$1,000)	Percent
	(1)	(2)	(3)	(4)	(5)	(6)
Total	14,706,060	48,728,654	100.0	50,948,264	3,299,300,157	100.0
Traditional IRA plans	5,305,442	12,632,543	25.9	40,776,679	2,956,687,858	89.6
SEP plans	1,571,637	13,757,176	28.2	3,464,511	168,681,300	5.1
SIMPLE plans	1,935,896	7,621,057	15.6	2,514,838	33,981,022	1.0
Roth IRA plans	6,657,635	14,717,878	30.2	13,479,182	139,949,977	4.2

contribute up to 20 percent of the first \$205,000 of an employee's compensation, or \$41,000. The statistics presented in this article include the contributions made by the employers on behalf of the employees and contributions made by self-employed individuals. In 2004, 1.6 million taxpayers contributed \$13.8 billion to SEP-IRAs, which was second only to contributions made to Roth IRAs. At year-end, 3.5 million taxpayers held \$169 billion in SEP-IRA accounts.

SIMPLE IRAs

Savings Incentive Match Plans for Employees (SIMPLE) IRAs, introduced in the Small Business Job Protection Act of 1996, also provide a mechanism for employers (including self-employed individuals) to provide a tax-favored retirement plan for their employees. In addition to employee-determined "salary reduction contributions," employers must make either matching contributions or non-elective contributions. For 2004, employee "salary reduction contributions" to a SIMPLE plan were limited to \$9,000, with a "catch-up" contribution allowance for those 50 and over of an additional \$1,500. Employer-matching contributions could not be more than 3 percent of an employee's compensation for the year, while nonelective contributions were limited to 2 percent of an employee's compensation for the year. Only \$205,000 of an employee's compensation could be used to determine the non-elective contribution limit. The statistics reported in this article include the amounts contributed as employee-determined "salary reduction contributions" and the employer's matching or nonelective contributions.

For 2004, 1.9 million taxpayers contributed to a SIMPLE IRA, 364,000 more individuals than for

SEP-IRAs, but their contributions represented only 13 percent of all IRA contributions.

Roth IRAs

Roth IRAs, introduced in the Taxpayer Relief Act of 1997, differ from traditional IRAs in several substantive ways. Contributions to Roth IRAs are never tax-deductible. However, qualified distributions from these plans are tax-free, and taxpayers are not required to take qualified distributions from these plans regardless of age. Similar to other IRAs, investment returns in the plan are not taxed each year. Contributions can be made regardless of age. However, no Roth IRA contributions were allowed for married taxpayers filing jointly who had modified adjusted gross incomes over \$160,000, or over \$10,000 for those filing separately. No Roth IRA contributions were allowed for unmarried taxpayers with modified adjusted gross incomes over \$110,000. These amounts have not changed since their introduction in 1998.

Like the traditional IRA, the maximum contribution amount was \$3,000 for taxpayers under age 50 and \$3,500 for those age 50 or older. Of the 6.7 million taxpayers in 2004 who contributed to a Roth IRA, 2.3 million taxpayers were age 50 or older. Of these 2.3 million taxpayers, 1.2 million taxpayers took advantage of the increased limit, and 94 percent of those taxpayers contributed the \$3,500 maximum (Table 7).

Trends in Contributions

Contributions by Size of Income

For 2004, approximately 145 million taxpayers, 79 percent of the total 184.1 million taxpayers, were eligible to make IRA contributions (Table 2), but only

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Figure B

Taxpayers with IRA Contributions, by Size of Adjusted Gross Income, Tax Year 2004

Size of adjusted gross income	IRA contributors		IRA contributions		End-of-year fair market value		
	Number	Percentage of eligible	Amount (\$1,000)	Average (\$1)	Number	Amount (\$1,000)	Average (\$1)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All taxpayers, total	14,706,060	10.1	48,728,654	3,314	50,948,264	3,299,300,158	64,758
\$0	105,045	13.4	339,361	3,231	548,038	30,372,230	55,420
\$1 under \$10,000	457,638	2.2	878,336	1,919	2,326,026	76,655,764	32,956
\$10,000 under \$20,000	752,288	3.8	1,286,603	1,710	4,157,517	176,699,453	42,501
\$20,000 under \$30,000	1,250,381	7.1	2,498,356	1,998	4,201,618	176,975,099	42,121
\$30,000 under \$40,000	1,310,584	8.9	3,052,654	2,329	4,338,263	182,163,851	41,990
\$40,000 under \$50,000	1,401,947	11.4	3,677,978	2,623	4,408,267	197,673,420	44,842
\$50,000 under \$75,000	2,977,444	12.3	7,932,144	2,664	9,980,108	534,142,176	53,521
\$75,000 under \$100,000	2,370,275	15.3	7,503,213	3,166	7,533,068	502,357,915	66,687
\$100,000 under \$200,000	3,005,606	19.8	12,982,307	4,319	9,675,188	798,035,628	82,483
\$200,000 or more	1,074,851	28.9	8,577,702	7,980	3,780,171	624,224,622	165,131

14.7 million taxpayers did so (Figure B and Table 2).³ Participation rates and average contributions increased with the size of adjusted gross income.⁴ Participation rates and average contributions were also high in the “No Adjusted Gross Income” category, which contains many well-to-do individuals who experienced temporary losses in the given tax year.

Contributions by Age of Contributor

Consistent with prior years, for 2004, the average contribution rose with the age of the taxpayer for all

age groups (Figure C and Table 4). The average contribution was \$1,875 for taxpayers under age 30 and \$3,843 for taxpayers in the 50 under 60 age group. The average increased for the 70-and-over age group to \$4,900, but the group represented only 160,000 taxpayers or 5 percent of all IRA contributors.

Contributions by Gender and Filing Status

On average, married individuals filing joint returns contribute larger amounts to their IRA accounts and maintain a larger yearend fair market value than do

Figure C

Taxpayers with IRA Contributions, by Age of Taxpayer, Tax Year 2004

Age	IRA contributors		IRA contributions		End-of-year fair market value		
	Number	Percentage of eligible	Amount (\$1,000)	Average (\$1)	Number	Amount (\$1,000)	Average (\$1)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All taxpayers, total	14,706,060	10.1	48,728,653	3,314	50,948,264	3,299,300,157	64,758
No age information	373	0.6	1,118	2,997	2,829	172,135	60,847
Under 30	1,405,223	4.5	2,634,920	1,875	2,340,522	13,373,032	5,714
30 under 40	3,000,561	8.7	8,459,439	2,819	7,404,413	145,890,215	19,703
40 under 50	3,892,862	10.9	12,827,808	3,295	11,271,482	381,199,444	33,820
50 under 60	4,236,384	14.8	16,281,574	3,843	13,114,334	869,483,501	66,300
60 under 70	2,010,730	16.8	7,740,072	3,849	9,639,297	1,088,406,443	112,913
70 and over	159,927	5.2	783,722	4,900	7,175,387	800,775,387	111,600

³ See Explanation of Selected Terms.

⁴ Taxpayers are grouped according to the adjusted gross income reported on the tax return. Thus, a married-filing-jointly return with \$200,000 in adjusted gross income results in two taxpayers reported in the “\$200,000 under \$500,000” category.

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Figure D

Taxpayers with IRA Contributions, by Taxpayer Filing Status and Gender, Tax Year 2004

Filing status and gender	IRA contributors		IRA contributions		End-of-year fair market value		
	Number	Percentage of eligible	Amount (\$1,000)	Average (\$1)	Number	Amount (\$1,000)	Average (\$1)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All taxpayers, total	14,706,060	10.1	48,728,654	3,314	50,948,264	3,299,300,158	64,758
Men	9,782,527	9.8	34,356,396	3,512	32,028,860	2,369,857,726	73,991
Women	4,923,534	10.9	14,372,258	2,919	18,919,404	929,442,432	49,126
Taxpayers filing joint returns, total	10,088,051	13.4	35,977,667	3,566	36,565,457	2,511,761,138	68,692
Men	6,762,052	12.8	25,704,277	3,801	23,923,449	1,982,705,632	82,877
Women	3,325,999	14.7	10,273,390	3,089	12,642,008	529,055,506	41,849
Taxpayers filing nonjoint returns, total	4,618,010	6.7	12,750,987	2,761	14,382,807	787,539,020	54,756
Men	3,020,475	6.4	8,652,119	2,864	8,105,411	387,152,094	47,765
Women	1,597,535	7.1	4,098,868	2,566	6,277,396	400,386,926	63,782

individuals filing nonjoint returns (Figure D and Table 5). Regardless of marital status, men tended to contribute more than women.

Summary

Approximately 50.9 million taxpayers held \$3.3 trillion in individual retirement arrangements based on the yearend 2004 fair market value of their plans. For Tax Year 2004, more than 14.7 million taxpayers made contributions of \$48.8 billion. However, only 5.5 million taxpayers were able to deduct their contributions on their individual income tax returns; 41 percent (\$20.2 billion) of the \$48.7 billion in contributions was deductible. More than 3.6 million taxpayers rolled over \$214.9 billion into IRA plans. For 2004, taxpayers also converted \$2.8 billion from traditional IRAs to Roth IRAs. Approximately 12.3 million taxpayers withdrew \$140 billion from their plans.

Explanation of Selected Terms

Modified Adjusted Gross Income—Adjusted Gross Income figured without taking into account any IRA deduction or foreign-earned income exclusion or foreign housing exclusion (deduction), any deduction for student loan interest, any qualified bond interest exclusion, and exclusions for certain tax-exempt interest amounts.

Eligible taxpayer—Those who qualified under Federal income tax law to make deductible or non-deductible contributions to a traditional and/or Roth

IRA plan. In other words, they include all taxpayers under age 70 ½ with earned income for traditional IRAs, as well as older taxpayers with earned income and modified adjusted gross income under the legally specified limits for Roth IRAs.

Fair Market Value (FMV)—On Form 5498, the trustee holding an IRA account reports to the owner and to the IRS the value of that account as of year's end (i.e., December 31).

Rollovers—Rollovers are amounts transferred from one account to another. In most cases, the amounts identified as “rollovers” on Form 5498 represent withdrawals from employer-sponsored plans that are then invested from one traditional IRA plan to another—but only if the taxpayer makes the withdrawal on his or her own and deposits the amount into another IRA account within 60 days. Trustee-to-trustee transfers are not generally considered rollovers; however, if a taxpayer made a contribution to one IRA during 2004, and later in the year decided to “recharacterize” it as a contribution to another IRA, the amount recharacterized is also shown as a rollover.

Data Sources and Limitations

The data presented in this article are based on information collected from matched samples of Forms 1040, *U.S. Individual Income Tax Return*; Forms 5498, *IRA Contribution Information*; and Forms 1099-R, *Distributions from Pensions Annuities, Retirement or Profit-Sharing Plans, IRAs, Insurance*

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Contracts, etc. for Tax Year 2004. Data from individual income tax returns (Form 1040) are based on a stratified weighted sample.⁵ For a general description of the sampling procedures and data limitations of Statistics of Income tabulations, see *Statistics of Income, Individual Income Tax Returns, 2004*.

In addition to the limitations of the Form 1040 sample described in the above-referenced report, special limitations apply to the Form 5498 data. As is true for Form 1040, these data are before audit. In the case of contributions to IRA plans, this means that some Forms 5498 show amounts in excess of the maximum allowable contributions. Based on research conducted on previous years' files, formulas were developed to either disallow the excess amounts or move them into the "rollover" category.

Distributions shown on Forms 1099-R were considered IRA distributions if either the "IRA/SEP/SIMP" box was checked, or if one of the category boxes contained a code indicating Roth or early SIMPLE IRA distributions. If all that was checked was the "IRA/SEP/SIMP" box, an allocation had to

be made to Traditional, SEP, or SIMP IRA distributions in order to classify the taxpayer in Tables 1 and 6. If the taxpayer's Form 5498 indicated a fair market value in one of those plans, it was chosen as the source of the distribution. All remaining amounts were classified as traditional IRA distributions.

References

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Sailer, Peter J. and Sarah E. Nutter, "Accumulation and Distribution of Individual Retirement Arrangements, 2000," *SOI Bulletin*, Spring 2004, Volume 23, Number 4, pp. 121-134.

Publication 590, *Individual Retirement Arrangements (IRAs)*, Internal Revenue Service, Department of Treasury, for more information on eligibility requirements and limitations.

⁵ For more information on matching and sampling procedures, see Sailer, Peter J.; Michael E. Weber; and Kurt S. Gurka (2002), "Are Taxpayers Increasing the Buildup of Retirement Assets? Preliminary Results from a Matched File of Tax Year 1999 Tax Returns and Information Returns," *National Tax Association Proceedings*, Ninety-fifth Annual Conference, pp. 364-369.

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Table 1. Taxpayers with Individual Retirement Arrangement (IRA) Plans, by Type of Plan, Tax Year 2004

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

Type of plan	Total contributions [1]		Contributions deducted on Form 1040		Rollovers	
	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
Total	14,706,060	48,728,654	5,587,535	20,245,616	3,636,027	214,878,446
Traditional IRA plans	5,305,442	12,632,543	4,011,681	10,028,607	3,636,027	214,878,446
SEP plans	1,571,637	13,757,176	920,770	7,923,068	n.a.	n.a.
SIMPLE plans	1,935,896	7,621,057	733,163	2,293,941	n.a.	n.a.
Roth IRA plans	6,657,635	14,717,878	n.a.	n.a.	n.a.	n.a.

Type of plan	Roth conversions [2]		Withdrawals [3]		End-of-year fair market value	
	Number	Amount	Number	Amount	Number	Amount
	(7)	(8)	(9)	(10)	(11)	(12)
Total	168,697	2,815,456	12,275,427	139,621,577	50,948,264	3,299,300,157
Traditional IRA plans	168,697	-2,815,456	11,737,957	133,041,979	40,776,679	2,956,687,858
SEP plans	N/A	N/A	308,432	4,511,946	3,464,511	168,681,300
SIMPLE plans	N/A	N/A	58,441	152,439	2,514,838	33,981,022
Roth IRA plans	168,697	2,815,456	604,830	1,915,213	13,479,182	139,949,977

N/A—Not applicable.

n.a.—Not available.

[1] For SEP and SIMPLE plans, total contributions include contributions made by the taxpayer directly, as well as those made by an employer.

[2] For Tax Year 2004, owners of traditional IRAs were able to convert traditional IRAs to Roth IRAs as long as they met the income limitations for making Roth IRA contributions. Under certain circumstances, SEP or SIMPLE IRAs could also be converted to Roth IRAs; however, these amounts could not be identified separately for the purpose of these statistics.

[3] Withdrawals are reported on Form 1099-R; does not include withdrawals made for the purpose of rollovers to other IRA accounts if the transfer was made by the trustee; Roth IRA conversions are shown separately.

NOTES: Except as noted, all data are from matched Forms 1040 and 5498; all figures are estimates based on samples—money amounts are in thousands of dollars.

SOURCE: Matched file of income tax returns, Forms 5498, and 1099-R for Tax Year 2004.

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Table 2. Taxpayers with Individual Retirement Arrangement (IRA) Plans, by Size of Adjusted Gross Income, Tax Year 2004

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

Size of adjusted gross income [1]	All taxpayers			Taxpayers with IRA accounts reported on Form 5498					
	Total	With pension coverage on Forms W-2 [2]	Eligible to make IRA contributions	Total contributions		Contributions deducted on Form 1040		Rollovers	
				Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
All taxpayers, total	184,171,485	65,841,897	144,909,584	14,706,060	48,728,654	5,587,535	20,245,616	3,636,028	214,878,448
\$0	2,402,976	148,412	782,603	105,045	339,361	33,163	130,826	30,811	1,234,872
\$1 under \$5,000	12,418,480	668,208	9,777,531	196,345	389,421	37,802	75,551	30,655	992,605
\$5,000 under \$10,000	13,373,159	1,374,082	10,573,960	261,293	488,915	94,046	186,843	79,814	2,561,548
\$10,000 under \$15,000	13,701,181	1,983,536	10,018,644	311,070	512,328	144,741	223,550	114,214	4,810,067
\$15,000 under \$20,000	13,918,724	2,937,962	10,072,756	441,218	774,275	240,570	427,516	117,316	3,692,873
\$20,000 under \$25,000	12,075,188	3,459,320	9,231,616	599,633	1,112,212	330,899	631,152	150,485	4,791,241
\$25,000 under \$30,000	10,902,509	3,568,056	8,415,980	650,748	1,386,144	373,537	892,775	132,419	4,926,566
\$30,000 under \$40,000	18,599,929	7,320,313	14,685,266	1,310,584	3,052,654	725,114	1,798,240	286,772	9,486,108
\$40,000 under \$50,000	15,261,524	6,527,994	12,303,223	1,401,947	3,677,978	628,934	1,874,936	302,068	12,118,226
\$50,000 under \$75,000	29,572,650	14,352,348	24,280,955	2,977,444	7,932,144	1,080,961	3,300,832	717,754	36,988,865
\$75,000 under \$100,000	18,279,097	10,335,206	15,532,744	2,370,275	7,503,213	631,016	2,426,032	576,893	29,428,700
\$100,000 under \$200,000	18,077,046	10,631,607	15,172,513	3,005,606	12,982,307	883,586	4,586,624	779,056	61,154,078
\$200,000 under \$500,000	4,344,839	2,066,978	3,245,112	848,705	6,532,438	304,645	2,828,327	244,371	29,791,969
\$500,000 under \$1,000,000	804,100	313,132	545,207	154,933	1,431,779	53,800	607,724	47,956	7,082,481
\$1,000,000 or more	440,083	154,743	271,474	71,213	613,485	24,721	254,688	25,444	5,818,249

Size of adjusted gross income [1]	Taxpayers with IRA accounts reported on Form 5498—continued					
	Roth conversions [3]		Withdrawals [4]		End-of-year fair market value	
	Number	Amount	Number	Amount	Number	Amount
	(10)	(11)	(12)	(13)	(14)	(15)
All taxpayers, total	168,697	2,815,456	12,275,427	139,621,577	50,948,264	3,299,300,158
\$0	1,934	91,098	116,294	1,540,883	548,038	30,372,230
\$1 under \$5,000	1,327	8,041	284,993	905,696	911,630	26,476,772
\$5,000 under \$10,000	897	3,252	626,137	2,632,107	1,414,396	50,178,992
\$10,000 under \$15,000	3,131	23,118	974,752	4,804,687	1,939,179	78,921,056
\$15,000 under \$20,000	3,977	23,625	1,025,986	5,163,777	2,218,338	97,778,397
\$20,000 under \$25,000	6,548	45,538	781,478	4,473,059	2,151,528	85,627,414
\$25,000 under \$30,000	7,417	55,941	700,161	4,789,422	2,050,090	91,347,685
\$30,000 under \$40,000	20,961	175,916	1,217,939	8,829,096	4,338,263	182,163,851
\$40,000 under \$50,000	16,407	124,594	1,092,850	9,126,556	4,408,267	197,673,420
\$50,000 under \$75,000	42,311	573,854	2,218,718	25,181,711	9,980,108	534,142,176
\$75,000 under \$100,000	33,048	856,038	1,353,985	21,390,645	7,533,068	502,357,915
\$100,000 under \$200,000	29,401	516,992	1,456,658	30,516,307	9,675,188	798,035,628
\$200,000 under \$500,000	979	130,791	337,777	14,157,116	2,903,801	425,150,187
\$500,000 under \$1,000,000	275	69,876	57,768	3,851,019	570,240	112,107,613
\$1,000,000 or more	84	116,782	29,931	2,259,496	306,130	86,966,822

[1] On joint returns, both taxpayers are placed into the same adjusted gross income class, as determined by the total amount on the return.

[2] Number of taxpayers with pension coverage is determined from Form W-2, box 13, which indicates participation in a retirement plan.

[3] Owners of traditional IRAs were able to convert them to Roth IRAs as long as they met the income limitations for making Roth IRA contributions. Under certain circumstances, SEP or SIMPLE IRAs could also be converted to Roth IRAs; however, these amounts could not be identified separately for the purpose of these statistics.

[4] Withdrawals are reported on Form 1099-R; does not include withdrawals for the purpose of rollovers to other IRA accounts if the transfer was made by the trustee; Roth IRA conversions are shown separately.

SOURCE: Matched file of income tax returns, Forms 5498, and 1099-R for Tax Year 2004.

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Table 3. Taxpayers with Individual Retirement Arrangement (IRA) Plans, by Type of Plan and by Size of Adjusted Gross Income, Tax Year 2004

[All figures are estimates based on samples—money amounts are in thousands of dollars and average amounts are in whole dollars]

Size of adjusted gross income [1]	Traditional IRA plans						SEP plans [3]					
	Total contributions			End-of-year fair market value			Total contributions			End-of-year fair market value		
	Number	Amount (\$1,000)	Average [2] (\$)	Number	Amount (\$1,000)	Average (\$)	Number	Amount (\$1,000)	Average (\$)	Number	Amount (\$1,000)	Average (\$)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
All taxpayers, total	5,305,443	12,632,545	2,381	40,776,681	2,956,687,858	72,509	1,571,637	13,757,176	8,753	3,464,511	168,681,300	48,688
\$0	43,203	108,754	2,517	415,345	25,996,515	62,590	10,802	95,107	8,805	53,157	1,794,696	33,762
\$1 under \$5,000	43,970	82,525	1,877	621,972	23,517,218	37,811	7,292	26,768	3,671	34,724	492,094	14,172
\$5,000 under \$10,000	71,044	133,563	1,880	1,128,673	46,688,352	41,366	18,685	41,880	2,241	58,243	1,177,716	20,221
\$10,000 under \$15,000	108,293	167,052	1,543	1,632,942	74,218,593	45,451	15,879	55,070	3,468	57,286	1,246,283	21,755
\$15,000 under \$20,000	187,866	352,481	1,876	1,848,286	92,607,886	50,105	34,150	61,050	1,788	77,606	2,054,707	26,476
\$20,000 under \$25,000	219,942	438,512	1,994	1,681,348	80,451,666	47,850	48,670	99,385	2,042	106,380	1,574,781	14,803
\$25,000 under \$30,000	273,741	561,719	2,052	1,588,337	84,888,138	53,445	47,433	161,635	3,408	99,806	1,635,717	16,389
\$30,000 under \$40,000	499,126	1,108,915	2,222	3,368,445	166,628,097	49,467	111,669	354,938	3,178	226,418	4,318,146	19,072
\$40,000 under \$50,000	527,263	1,235,223	2,343	3,431,222	176,358,427	51,398	116,904	582,326	4,981	272,344	8,550,876	31,397
\$50,000 under \$75,000	1,038,071	2,340,848	2,255	7,830,006	480,170,196	61,324	247,139	1,281,909	5,187	559,401	19,785,421	35,369
\$75,000 under \$100,000	651,211	1,501,565	2,306	5,939,042	443,628,084	74,697	247,524	1,627,409	6,575	557,669	24,839,298	44,541
\$100,000 under \$200,000	987,760	2,643,890	2,677	7,900,227	704,880,614	89,223	401,446	4,388,066	10,931	853,469	46,691,095	54,707
\$200,000 under \$500,000	502,773	1,496,036	2,976	2,581,314	375,845,683	145,602	209,893	3,708,490	17,668	395,083	39,525,853	100,044
\$500,000 under \$1,000,000	100,888	306,343	3,036	523,280	100,509,155	192,075	38,638	901,986	23,345	77,708	9,615,764	123,742
\$1,000,000 or more	50,292	155,119	3,084	286,242	80,299,234	280,529	15,513	371,157	23,926	35,217	5,378,853	152,735
Size of adjusted gross income [1]	SIMPLE plans [4]						Roth IRA plans					
	Total contributions			End-of-year fair market value			Total contributions			End-of-year fair market value		
	Number	Amount (\$1,000)	Average (\$)	Number	Amount (\$1,000)	Average (\$)	Number	Amount (\$1,000)	Average [2] (\$)	Number	Amount (\$1,000)	Average (\$)
	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
All taxpayers, total	1,935,895	7,621,057	3,937	2,514,839	33,981,023	13,512	6,657,634	14,717,879	2,211	13,479,182	139,949,977	10,383
\$0	8,817	41,374	4,693	21,595	295,845	13,700	45,357	94,126	2,075	144,539	2,285,174	15,810
\$1 under \$5,000	4,873	3,634	746	12,169	74,299	6,106	144,086	276,493	1,919	309,836	2,393,162	7,724
\$5,000 under \$10,000	24,035	46,990	1,955	33,919	231,362	6,821	152,031	266,483	1,753	289,692	2,081,563	7,185
\$10,000 under \$15,000	45,478	32,633	718	63,910	490,346	7,672	149,127	257,572	1,727	331,226	2,965,834	8,954
\$15,000 under \$20,000	57,577	59,407	1,032	93,650	287,553	3,071	184,434	301,337	1,634	365,358	2,828,252	7,741
\$20,000 under \$25,000	103,884	167,040	1,608	143,262	560,396	3,912	246,756	407,275	1,651	458,074	3,040,571	6,638
\$25,000 under \$30,000	121,358	243,615	2,007	142,062	984,328	6,929	238,080	419,175	1,761	453,956	3,839,502	8,458
\$30,000 under \$40,000	235,137	567,078	2,412	285,488	2,325,134	8,144	535,289	1,021,724	1,909	1,060,361	8,892,475	8,386
\$40,000 under \$50,000	193,724	489,605	2,527	252,556	2,266,936	8,976	623,365	1,370,824	2,199	1,206,220	10,497,180	8,703
\$50,000 under \$75,000	437,464	1,258,741	2,877	551,920	5,422,148	9,824	1,397,311	3,050,646	2,183	2,814,819	28,764,410	10,219
\$75,000 under \$100,000	268,343	1,176,925	4,386	344,766	5,560,693	16,129	1,346,487	3,197,315	2,375	2,419,114	28,329,840	11,711
\$100,000 under \$200,000	290,256	2,083,849	7,179	384,286	8,766,666	22,813	1,520,654	3,866,502	2,543	3,180,186	37,697,252	11,854
\$200,000 under \$500,000	118,585	1,157,115	9,758	151,284	5,314,347	35,128	68,111	170,799	2,508	396,660	4,464,304	11,255
\$500,000 under \$1,000,000	19,036	208,893	10,974	24,524	990,508	40,389	5,380	14,557	2,706	37,288	992,186	26,609
\$1,000,000 or more	7,328	84,158	11,484	9,448	410,462	43,444	1,166	3,051	2,617	11,853	878,272	74,097

[1] On joint returns, both taxpayers are placed into the same adjusted gross income class, as determined by the total amount on the return.

[2] The statistics are based on unaudited data and contain some amounts in excess of the legal maximum. For additional explanation, see Data Sources and Limitations section of the article.

[3] For SEP plans, total contributions include contributions made by the taxpayer directly, as well as those made by an employer.

[4] For SIMPLE plans, total contributions include contributions made by the taxpayer directly, as well as those made by an employer.

SOURCE: Matched file of income tax returns, Forms 5498, and 1099-R for Tax Year 2004.

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Table 4. Taxpayers with Individual Retirement Arrangement (IRA) Plans, by Age of Taxpayer, Tax Year 2004

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

Age	All taxpayers			Taxpayers with IRA accounts reported on Form 5498					
	Total	With pension coverage on Forms W-2 [1]	Eligible to make IRA contributions	Total contributions		Contributions deducted on Form 1040		Rollovers	
				Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
All taxpayers, total	184,171,487	65,841,897	144,909,585	14,706,060	48,728,653	5,587,536	20,245,617	3,636,026	214,878,448
No age information	91,904	21,443	65,757	373	1,118	373	1,118	373	186
Under 15	529,706	8,649	87,109	13,339	31,321	4,928	9,668	0	0
15 under 20	3,937,311	258,436	3,572,544	65,143	116,133	16,008	9,691	935	2,804
20 under 25	13,374,661	2,713,626	12,726,264	372,072	636,528	102,300	147,847	16,311	50,241
25 under 30	15,995,556	5,783,553	14,650,938	954,669	1,850,938	263,236	479,717	107,440	862,800
30 under 35	17,174,229	7,255,351	15,139,238	1,229,889	2,980,507	348,648	888,514	253,905	3,163,295
35 under 40	22,382,203	9,252,474	19,329,433	1,770,672	5,478,932	497,512	1,964,155	433,894	21,688,016
40 under 45	19,978,422	9,159,126	17,551,960	1,762,876	5,564,245	566,875	2,026,130	364,474	12,960,780
45 under 50	20,421,625	9,780,452	18,049,178	2,129,986	7,263,563	780,225	2,972,204	377,747	14,202,489
50 under 55	18,231,125	8,819,896	15,923,110	2,231,785	8,200,025	921,688	3,467,085	501,202	27,681,268
55 under 60	15,463,237	7,001,989	12,709,726	2,004,599	8,081,549	906,406	3,686,415	490,787	41,209,845
60 under 65	11,709,051	3,811,882	8,122,854	1,383,096	5,473,130	727,772	2,849,851	485,130	43,578,426
65 under 70	8,199,787	1,330,101	3,880,276	627,634	2,266,942	382,501	1,335,607	322,959	28,245,508
70 under 75	6,336,503	431,238	1,799,789	127,858	632,955	55,460	328,062	182,201	15,851,621
75 under 80	4,795,571	154,104	831,598	26,119	110,213	8,452	52,636	58,812	3,642,797
80 and over	5,550,596	59,577	469,811	5,950	40,554	5,152	26,917	39,856	1,738,372

Age	Taxpayers with IRA accounts reported on Form 5498—continued					
	Roth conversions [2]		Withdrawals [3]		End-of-year fair market value	
	Number	Amount	Number	Amount	Number	Amount
	(10)	(11)	(12)	(13)	(14)	(15)
All taxpayers, total	168,698	2,815,457	12,275,427	139,621,578	50,948,264	3,299,300,157
No age information	0	0	0	0	2,829	172,135
Under 15	0	0	4,697	5,977	29,592	417,749
15 under 20	0	0	3,649	12,091	100,470	661,114
20 under 25	2,977	5,428	36,782	255,320	589,915	2,641,417
25 under 30	9,914	56,533	166,685	542,640	1,620,545	9,652,752
30 under 35	12,964	75,461	266,096	1,274,516	2,722,574	29,234,284
35 under 40	18,186	202,391	482,856	5,362,356	4,681,839	116,655,931
40 under 45	12,501	213,414	489,603	5,114,872	5,071,123	143,141,666
45 under 50	19,602	276,649	607,792	6,453,626	6,200,359	238,057,778
50 under 55	23,383	364,400	589,935	9,185,031	6,663,442	361,996,921
55 under 60	19,357	243,148	696,766	12,838,593	6,450,892	507,486,580
60 under 65	24,495	763,390	1,075,833	21,775,755	5,503,054	555,107,774
65 under 70	13,441	344,996	1,184,720	21,581,413	4,136,243	533,298,669
70 under 75	7,952	214,628	2,684,097	27,339,128	3,239,670	433,855,922
75 under 80	3,772	51,986	2,364,365	17,555,964	2,352,067	249,480,659
80 and over	154	3,033	1,621,551	10,324,296	1,583,650	117,438,806

[1] Number of taxpayers with pension coverage is determined from Form W-2, box 13, which indicates participation in a retirement plan.

[2] Owners of traditional IRAs were able to convert them to Roth IRAs as long as they met the income limitations for making Roth IRA contributions. Under certain circumstances, SEP or SIMPLE IRAs could also be converted to Roth IRAs; however, these amounts could not be identified separately for the purpose of these statistics.

[3] Withdrawals are reported on Form 1099-R; does not include withdrawals for the purpose of rollovers to other IRA accounts if the transfer was made by the trustee; Roth IRA conversions are shown separately.

SOURCE: Matched file of income tax returns, Forms 5498, and 1099-R for Tax Year 2004.

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Table 5. Taxpayers with Individual Retirement Arrangement (IRA) Plans, by Taxpayer Filing Status and Gender, Tax Year 2004

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

Filing status and gender	All taxpayers			Taxpayers with IRA accounts reported on Form 5498					
	Total	With pension coverage on Forms W-2 [1]	Eligible to make IRA contributions	Total contributions		Contributions deducted on Form 1040		Rollovers	
				Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(10)	(11)
All taxpayers, total	184,171,487	65,841,898	144,909,584	14,706,060	48,728,654	5,587,535	20,245,615	3,636,026	214,878,446
Men	120,045,432	45,046,379	99,835,865	9,782,527	34,356,396	3,762,073	14,275,821	2,421,254	160,516,993
Women	64,126,055	20,795,519	45,073,719	4,923,534	14,372,258	1,825,462	5,969,794	1,214,772	54,361,453
Taxpayers filing joint returns, total	103,895,183	39,508,459	75,545,093	10,088,051	35,977,667	3,400,575	12,839,011	2,546,473	166,088,135
Men	68,005,850	27,890,967	52,985,222	6,762,052	25,704,277	2,352,754	9,217,565	1,803,788	133,102,341
Women	35,889,333	11,617,492	22,559,871	3,325,999	10,273,390	1,047,821	3,621,446	742,685	32,985,794
Taxpayers filing nonjoint returns, total	80,276,304	26,333,439	69,364,491	4,618,010	12,750,987	2,186,960	7,406,604	1,089,553	48,790,311
Men	52,039,582	17,155,412	46,850,643	3,020,475	8,652,119	1,409,319	5,058,256	617,466	27,414,652
Women	28,236,722	9,178,027	22,513,848	1,597,535	4,098,868	777,641	2,348,348	472,087	21,375,659

Filing status and gender	Taxpayers with IRA accounts reported on Form 5498—continued					
	Roth conversions [2]		Withdrawals [3]		End-of-year fair market value	
	Number	Amount	Number	Amount	Number	Amount
	(12)	(13)	(14)	(15)	(17)	(18)
All taxpayers, total	168,697	2,815,456	12,275,428	139,621,578	50,948,264	3,299,300,158
Men	124,722	2,187,885	7,114,717	98,256,823	32,028,860	2,369,857,726
Women	43,975	627,571	5,160,711	41,364,755	18,919,404	929,442,432
Taxpayers filing joint returns, total	111,450	2,136,798	8,157,568	97,859,050	36,565,457	2,511,761,138
Men	90,082	1,795,443	5,421,534	79,567,915	23,923,449	1,982,705,632
Women	21,368	341,355	2,736,034	18,291,135	12,642,008	529,055,506
Taxpayers filing nonjoint returns, total	57,247	678,658	4,117,860	41,762,528	14,382,807	787,539,020
Men	34,640	392,442	1,693,183	18,688,908	8,105,411	387,152,094
Women	22,607	286,216	2,424,677	23,073,620	6,277,396	400,386,926

[1] Number of taxpayers with pension coverage is determined from Form W-2, box 13, which indicates participation in a retirement plan.

[2] Owners of traditional IRAs were able to convert them to Roth IRAs as long as they met the income limitations for making Roth IRA contributions. Under certain circumstances, SEP or SIMPLE IRAs could also be converted to Roth IRAs; however, these amounts could not be identified separately for the purpose of these statistics.

[3] Withdrawals are reported on Form 1099-R; does not include withdrawals for the purpose of rollovers to other IRA accounts if the transfer was made by the trustee; Roth IRA conversions are shown separately.

SOURCE: Matched file of income tax returns, Forms 5498, and 1099-R for Tax Year 2004.

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Table 6. Taxpayers with Traditional Individual Retirement Arrangement (IRA) Plans, by Type of Plan and by Age of Taxpayer, Tax Year 2004

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

Age of taxpayer	Total contributions to Traditional IRA plans													
	Total		Under \$2,000		Exactly \$2,000		Over \$2,000, under \$3,000		Exactly \$3,000		Over \$3,000, under \$3,500		Exactly \$3,500	
	Number	Amount (\$1,000)	Number	Amount (\$1,000)	Number	Amount (\$1,000)	Number	Amount (\$1,000)	Number	Amount (\$1,000)	Number	Amount (\$1,000)	Number	Amount (\$1,000)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
All taxpayers, total	5,305,443	12,632,543	1,624,115	1,301,719	362,076	724,152	276,557	684,008	1,430,331	4,290,990	63,958	212,256	1,548,405	5,419,416
No age information	373	1,118	0	0	0	0	0	0	373	1,118	0	0	0	0
Under 15	2,014	6,043	0	0	0	0	0	0	2,014	6,043	0	0	0	0
15 under 20	12,037	13,945	8,018	4,295	2,006	4,012	999	2,596	1,014	3,041	0	0	0	0
20 under 25	58,627	91,977	31,105	21,307	10,051	20,102	2,040	4,275	15,431	46,292	0	0	0	0
25 under 30	146,791	264,259	69,200	42,730	8,417	16,833	6,786	17,528	62,389	187,167	0	0	0	0
30 under 35	259,198	478,275	117,718	76,132	13,511	27,021	16,634	41,119	111,334	334,003	0	0	0	0
35 under 40	487,216	1,058,045	168,263	137,011	24,791	49,582	23,473	59,385	270,689	812,066	0	0	0	0
40 under 45	516,001	1,112,799	180,794	149,951	23,790	47,580	32,143	77,447	279,274	837,821	0	0	0	0
45 under 50	722,477	1,526,849	256,811	197,899	48,580	97,160	38,887	97,195	378,199	1,134,596	0	0	0	0
50 under 55	957,304	2,244,938	312,284	249,853	82,743	165,487	51,164	124,464	162,621	487,863	16,167	54,134	332,325	1,163,137
55 under 60	936,532	2,516,641	226,640	209,861	67,466	134,932	38,301	96,009	69,273	207,820	15,975	51,946	518,878	1,816,073
60 under 65	785,139	2,134,329	175,327	150,503	45,101	90,202	51,388	127,125	53,048	159,144	24,970	83,791	435,304	1,523,564
65 under 70½	421,734	1,183,325	77,955	62,177	35,620	71,241	14,742	36,865	24,672	74,016	6,846	22,385	261,898	916,642

NOTE: Traditional IRA refers to any IRA that is not a Roth IRA or a SIMPLE IRA, as defined by Publication 590 p. 3.

SOURCE: Matched file of income tax returns, Forms 5498, and 1099-R for Tax Year 2004.

Accumulation and Distribution of Individual Retirement Arrangements, 2004

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Table 7. Taxpayers with Roth Individual Retirement Account (IRA) Plans, by Type of Plan and by Age of Taxpayer, Tax Year 2004

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

Age of taxpayer	Total contributions to Roth IRA plans													
	Total		Under \$2,000		Exactly \$2,000		Over \$2,000, under \$3,000		Exactly \$3,000		Over \$3,000, under \$3,500		Exactly \$3,500	
	Number	Amount (\$1,000)	Number	Amount (\$1,000)	Number	Amount (\$1,000)	Number	Amount (\$1,000)	Number	Amount (\$1,000)	Number	Amount (\$1,000)	Number	Amount (\$1,000)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
All taxpayers, total	6,657,633	14,717,879	2,515,215	2,134,841	250,544	501,087	437,249	1,093,966	2,192,661	6,577,980	81,501	278,372	1,180,466	4,131,630
No age information	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Under 15	9,383	24,451	2,368	3,600	0	0	1,395	3,994	5,619	16,857	0	0	0	0
15 under 20	55,106	101,496	25,476	18,578	698	1,395	6,653	14,683	22,280	66,839	0	0	0	0
20 under 25	264,229	467,664	128,421	79,656	11,601	23,201	17,492	44,662	106,715	320,145	0	0	0	0
25 under 30	623,182	1,131,993	302,895	219,350	20,028	40,057	58,520	147,367	241,740	725,219	0	0	0	0
30 under 35	731,835	1,378,890	347,879	282,502	31,644	63,289	53,425	136,437	298,887	896,662	0	0	0	0
35 under 40	920,401	1,792,073	430,128	378,903	29,523	59,047	59,931	151,670	400,818	1,202,453	0	0	0	0
40 under 45	861,184	1,775,124	350,208	303,086	32,177	64,355	59,390	149,458	419,409	1,258,226	0	0	0	0
45 under 50	930,255	1,984,428	337,964	281,269	40,596	81,192	71,624	181,752	480,071	1,440,214	0	0	0	0
50 under 55	890,184	2,216,069	286,649	273,457	28,594	57,189	44,744	110,249	154,629	463,887	31,778	108,024	343,790	1,203,263
55 under 60	738,191	2,062,376	167,903	170,954	30,806	61,611	37,064	88,239	30,787	92,361	22,140	75,992	449,491	1,573,219
60 under 65	408,634	1,116,980	100,959	87,710	13,666	27,331	16,341	40,348	17,513	52,538	17,273	58,961	242,883	850,092
65 under 70	143,024	414,754	23,964	25,024	9,237	18,473	6,494	14,318	8,973	26,920	5,920	20,487	88,438	309,531
70 or more	82,025	251,581	10,401	10,752	1,974	3,947	4,176	10,789	5,220	15,659	4,390	14,908	55,864	195,525

NOTE: Roth IRA refers to an individual retirement plan that is subject to the rules that apply to a traditional IRA with exceptions, as defined by Publication 590 p. 36.

SOURCE: Matched file of income tax returns, Forms 5498, and 1099-R for Tax Year 2004.

The One-Time Received Dividend Deduction

by Melissa Redmiles

Congress created the one-time dividend received deduction in the Homeland Investment Act, incorporated into the American Jobs Creation Act of 2004, to encourage U.S. corporations to repatriate their foreign earnings and place them in investments that would promote U.S. job growth. The newly added Internal Revenue Code section 965 outlines the provisions for this deduction, while Notice 2005-10, Notice-2005-35, and Notice 2005-64 provide additional guidelines. These provisions permit U.S. corporations a one-time deduction of 85 percent of the extraordinary dividends received from their controlled foreign corporations (CFCs), subject to certain limitations, from their U.S. taxable incomes, provided that the repatriated earnings are used to fund allowable domestic investments. A controlled foreign corporation is a corporation in which the U.S. shareholders own directly, indirectly, or constructively, more than 50 percent of either the total combined voting power or the total value of all stock on any day of the taxable year of the corporation. Generally, foreign earnings are not taxed until they are repatriated. Allowing the 85-percent deduction lowers the effective tax rate on qualifying dividends for corporations taxed at the highest rate from 35 percent to 5.25 percent [15 percent of taxable dividends X 35 percent]. The deduction could be claimed either in the last tax year that begins before October 22, 2004, or the last year that begins during the 1-year period beginning on October 22, 2004.

Cash dividends eligible for the deduction included section 302 and section 304 redemptions of stock, section 316 dividends, and cash from inbound liquidations considered a dividend by the provisions of section 367(b). Other amounts treated as dividends under section 367, as well as section 1248 dividends, subpart F income from the earnings and profits of CFCs, and previously taxed income (PTI), were not eligible. Earnings could be repatriated from lower-tier CFCs.

To qualify as extraordinary, the cash dividends received had to exceed the average dividend received from the corporation's CFCs over a base period defined as the 5 tax years ending prior to July 1, 2003.

The base period dividends included distribution of PTI under subpart F, dividends of property, and section 956 distributions. To compute the average, the maximum and minimum annual dividends were discarded, and the remaining 3 tax years were averaged.

Qualifying dividends were further limited to the greater of \$500 million or either the amount of earnings permanently reinvested outside the U.S. according to the corporation's balance sheet of its most recently audited financial statement as of June 30, 2003, or 35 percent of the specific tax liability attributable to earnings permanently reinvested outside the U.S. To meet the domestic reinvestment qualification, taxpayers had to file a domestic reinvestment plan (DRP) with their financial statements. The investment has to be in the form of cash, not stock, and has to be paid to unrelated persons, with the exception of pension payments. Permitted types of investments included hiring of new employees or training of existing staff, increase in the employees' salary or benefits, excluding executives, research and development, (if conducted within the United States) investments in infrastructure, intangible property and other capital investments, certain types of debt repayment, advertising or marketing, and acquisition of business entities, including foreign entities. Specifically not permitted investments include executive compensation, intercompany transactions, shareholder distributions, stock redemptions, portfolio investments, local, State or Federal tax payments and purchases of Treasury bills, and municipal or corporate bonds. However, as long as corporations meet their investment plans as outlined in their DRPs, they are free to spend as equivalent amount on something else.

Taxpayers were also required to reduce qualifying dividends by any increase in their CFC debt to related persons. This requirement prevented taxpayers from loaning funds to their CFCs and including the payments in their cash dividends. An exception existed for banks and securities dealers and for intercompany trade payables.

Finally, U.S. corporations were not permitted to use the dividend deduction to eliminate all of their taxable incomes. In cases where their net operating losses or other deductions were greater than the nondeductible portion of the qualifying dividends, corporations had to set taxable income equal to the nondeductible portion.

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Taxpayers were permitted to specify which dividends qualified for the deduction. Ideally, corporations would specify dividends subject to low foreign taxes as qualifying and use the dividends received from countries with relatively high tax rates to satisfy the base period amount requirement. Such delineation was beneficial because withholding taxes could not be included in the dividend deduction and because foreign taxes paid on the deductible portion of the qualifying dividends were not eligible for the foreign tax credit, but foreign taxes paid on nonqualifying dividends could be credited.

Data Sources and Limitations

Most of the statistics in this article are based on information reported on Form 8895 and related corporate returns selected for Statistics of Income's corporate sample for Tax Years 2004 through 2006. Industry codes and the country of incorporation of the controlled foreign corporations distributing the dividends were from SOI's 2004 Form 5471 study, where a CFC with a matching name on Form 8895, Part V existed. SOI also examined Form 1118, Schedule C to determine the country of incorporation in cases where a match with the Form 5471 could not be made due to a lack of adequate information provided by the taxpayer.

The returns in this study were selected after administrative processing but prior to any amendments or audit examination. The estimates are based on a stratified probability sample of 784 returns selected from a population of corporations reporting the dividend deduction on their corporate returns, and are thus subject to sampling error. The sampling error is considered to be very small, as most corporations in the study are relatively large, and large corporations are sampled at 100 percent. Each return in the sample was given a distinct weight, calculated by dividing the number of returns in a certain section of the study (industry, accounting period, etc.) by the number of sample returns for the same section. The purpose of these weights is to adjust for the various sampling rates used, relative to the population.

For the purposes of this article, weighted totals are used for all counts and numerical values. Data in this article, unless otherwise stated, refer just to those corporations claiming the dividend deduction.

The Results

Some 843 corporations, a relatively small number of corporations given that roughly 9,700 corporations had CFCs in 2004, took advantage of the deduction. But these corporations repatriated almost \$362 billion. Of that, \$312 billion qualified for the deduction, creating a total deduction of \$265 billion. In comparison, \$804 billion of end-of-year, accumulated, nontaxable earnings and profits were reported for all controlled foreign corporations of all U.S. corporations for Tax Year 2004, the last tax year for which this statistic is available. Most corporations, 86 percent, reported the deduction for Tax Year 2005, while 7.7 percent reported it for Tax Year 2004, and the remaining 6.8 percent reported it for Tax Year 2006. Generally, corporations claiming the deduction were fairly large firms repatriating substantial amounts of their foreign earnings. The average total year-end assets were over \$24 billion, while the average amount repatriated was roughly \$429 million, and the average qualifying dividend was \$370 million.

Industry Composition

Figure A displays the number of returns, the cash dividends repatriated, the qualifying dividends, and the percentage of the total qualifying dividends, by selected major and minor industries. Manufacturing firms accounted for just over half the total returns, but 81 percent of the total qualifying dividends. Although corporations in the pharmaceutical and medicine manufacturing comprised a mere 3.4 percent of the filers reporting the deduction, they were responsible for 29 percent of the cash dividends repatriated and almost one-third of the qualifying dividends. This industry repatriated nearly \$106 billion dollars and was able to deduct almost \$84 billion. The computer and electronic equipment manufacturing industry also accounted for a substantial amount of the repatriation, with 19 percent of the total cash dividends.

Figure B provides a look at the average end-of-year total assets, average cash and qualifying dividends, and the percentage of cash dividends that qualified for the deduction by the same industry groups. The finance, insurance, real estate, and rental and leasing industry group had the largest average end-of-year total assets, but brought back

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Figure A

Repatriated Dividends, Selected Items by Selected Major and Minor Industry of Parent Corporation, Tax Years 2004-2006

[Money amounts are in billions of dollars]

Industry	Returns		Cash dividends		Qualifying dividends	
	Number	Percent of total	Amount	Percent of total	Amount	Percent of total
	(1)	(2)	(3)	(4)	(5)	(6)
All industries, total	843	100	361.9	100	312.3	100
Manufacturing	465	55	289.4	80.0	252.2	80.8
Computer and electronic equipment	85	10	68.6	18.9	57.5	18.4
Pharmaceutical and medicine	29	3	105.5	29.2	98.8	31.6
Wholesale and retail trade	133	16	14.7	4.1	12.9	4.1
Information	49	6	14.6	4.0	13.2	4.2
Finance, insurance, real estate, and rental and leasing	49	6	13.3	3.7	11.9	3.8
All other industries	147	17	29.8	8.2	22.1	7.1

Figure B

Repatriated Dividends, Selected Averages, by Selected Major and Minor Industry of Parent Corporation, Tax Years 2004-2006

[Money amounts are in millions of dollars]

Industry	Average total assets	Average cash dividends	Average qualifying dividends	Qualifying dividends as a percentage of cash dividends
	(1)	(2)	(3)	(4)
All industries, total	24,003.8	429.3	370.5	86.3
Manufacturing	12,744.8	622.4	542.5	87.2
Computer and electronic equipment	4,950.9	806.7	676.3	83.8
Pharmaceutical and medicine	27,187.7	3,638.0	3,406.2	93.6
Wholesale and retail trade	2,320.4	110.5	96.7	87.5
Information	24,692.1	297.7	269.4	90.5
Finance, insurance, real estate, and rental and leasing	71,553.1	271.9	243.2	89.4
All other industries	63,158.3	202.9	150.3	74.1

less, on average, than the \$429 million for all corporations. The manufacturing industry as a whole reported smaller average total assets, but repatriated an average of \$622 million. Within manufacturing, the pharmaceutical and medicine manufacturing industry stands out, with an impressive average cash dividend of \$3.6 billion dollars and an average qualifying dividend of \$3.4 billion. The wholesale and retail trade industry group had the lowest average repatriation,

with an average cash dividend of about \$111 million, of which about 97 million, on average, qualified.

Differences in the average dividend repatriated between industry groups may be due to differences in the amount of accumulated earnings and profits, the ability to extract those earnings from CFCs in cash within the allotted time frame, and the availability of foreign versus domestic investment opportunities.

^{1, 2} The pharmaceutical industry tends to have more

¹ "Tax-Advantaged Repatriation of Foreign Cash Set To Expire at Year-End," *PriceWaterhouseCoopers Pharma Tax News*, Volume 4, Number 11.

² Blouin, Jennifer and Linda Krull, "Bringing It Home: A Study of Incentives Surrounding the Repatriation of Foreign Earnings under the American Jobs Creation Act of 2004," National Tax Association, August 2006.

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cash on hand than other industries, due to high profit margins and minimal capital spending. Furthermore, industry experts speculate that the pharmaceutical industry plans to use at least some of their repatriated earnings to acquire small biotech companies that already have new drugs in the works.³

Overall, about 86 percent of cash dividends qualified for the deduction. The percentage for the pharmaceutical and medicine manufacturing industry was noticeably higher, at 94 percent.

The industrial makeup of the CFCs distributing the dividends differed somewhat than the makeup of the parent returns (Figure C). Although CFCs engaged in the manufacturing of pharmaceuticals and medicine were responsible for about 24 percent of the cash dividends and 27 percent of the qualifying dividends, CFCs that produce computer and electronic equipment accounted for only 7.8 percent of the cash dividends. Bank holding and other holding companies, not surprisingly, however, accounted for 27 percent of the cash dividends.

The Effect of the Limitations

Of all the various limitations that determine the amount of qualifying dividends, the requirement that qualifying dividends had to be extraordinary impacted the largest percentage of filers. Over half (56 percent), of the returns reported a base dividend. The total amount of base dividends was about \$34 billion,

approximately 9 percent of the total cash dividends. Only 38 corporations, or about 5 percent, reported qualifying dividends equal to the cap of the greater of \$500 million or either their permanently invested foreign earnings or 35 percent of the tax liability attributable to earnings permanently reinvested. Roughly one-fifth, however, planned to reinvest less than their extraordinary dividends. Overall, these firms lowered their otherwise qualifying dividends by \$14.6 billion, about 4 percent of total cash dividends for all firms claiming the deduction. Just 6 percent of corporations lowered their qualifying dividends by \$0.2 billion due to increased debt of their CFCs to related persons.

Planned Completion Date

Most corporations planned to complete their domestic reinvestments in the near term. About one-third reported a planned completion date that fell within the taxable year in which the dividend deduction was claimed. Almost 70 percent of filers indicated their reinvestment would be completed by the end of 2007. Only 6 percent reported a completion date later than the end of 2009. See Figure D.

Country Distribution of Repatriated Dividends

Figure E provides a regional distribution of the cash dividends by the country of incorporation of the distributing CFC. CFCs incorporated in Europe

Figure C

Repatriated Dividends, By Major and Selected Minor Industry of Distributing CFC, Tax Year 2004-2006

[Money amounts are in billions of dollars]

Industry	CFCs		Cash dividends		Qualifying dividends	
	Number	Percentage of total	Amount	Percentage of total	Amount	Percentage of total
	(1)	(2)	(3)	(4)	(5)	(6)
All industries, total	4,246	100.0	361.9	100	312.3	100.0
Manufacturing	1,361	32.1	168.8	46.6	156.5	50.1
Pharmaceutical and medicine	103	2.4	88.1	24.4	84.9	27.2
Wholesale and retail trade	739	17.4	23.1	6.4	16.6	5.3
Finance, insurance, real estate, and rental and leasing	386	9.1	20.8	5.7	16.6	5.3
Management of companies and enterprises	509	12.0	97.7	27.0	82.6	26.5
All other industries	1,251	29.4	51.5	14.2	40.0	12.8

³ Brush, Michael, "A Corporate Tax Break That Could Benefit You," *MSN.Money*, February 9, 2005, <http://moneycentral.msn.com/content/P107022.asp>

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Figure D

Planned Completion Dates for Reinvestment

Planned date of completion	Number of returns	Percentage of total
By the end of:		
Total	843	100.0
2005	213	25.3
2006	206	24.4
2007	171	20.3
2008	75	8.9
2009	97	11.5
After 2009	51	6.0
Not specified	31	3.7

were responsible for 62 percent of the total repatriated cash dividends, while the Western Hemisphere, excluding Canada and Latin America, accounted for 11.4 percent. The latter figure is not surprising, since this country group includes many small Caribbean nations known to have favorable tax policies.

A closer look at the countries of incorporation with the largest percentage of cash dividends shows that the dominance of Europe is due to a large percentage of cash dividends from a handful of European nations. Figure F below displays the percentage of CFCs and the percentage of cash dividends dis-

tributed, by the country of incorporation for the seven countries with the largest percentages of cash dividends. The Netherlands tops the list, with about 6 percent of the CFCs, but over 26 percent of the cash dividends. It is followed by Switzerland, Bermuda, Ireland, Canada, Luxembourg, the United Kingdom, and the Cayman Islands. Firms can be expected to park considerable shares of their earnings and profits in the Netherlands, Switzerland, Bermuda, Ireland, Luxembourg, and the Cayman Islands, as these countries are known for their favorable tax policies.

Canada and the United Kingdom, however, make the top seven list because a large number of CFCs exist in these two countries, as is evident in Figure G. This table lists the frequency of parent returns with CFCs incorporated in the seven countries previously mentioned, the average cash and qualifying dividend from each country, and the qualifying dividends as a percentage of the cash dividends. The countries are listed in descending order of largest average cash dividends. More corporations have CFCs incorporated in United Kingdom and Canada than in the other six selected countries, but the average cash and qualifying dividends are much lower than the average for all countries. In contrast, the number of returns with CFCs incorporated in Bermuda or Luxembourg

Figure E

Cash Dividends from CFCs, by Country of Incorporation

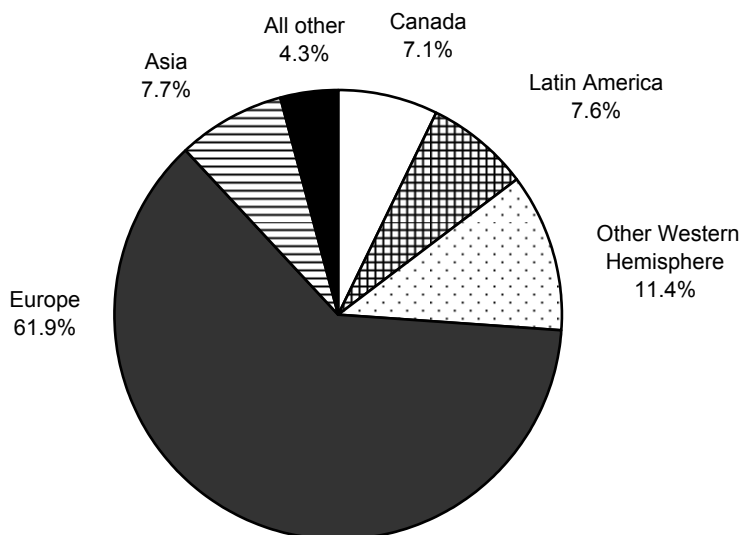
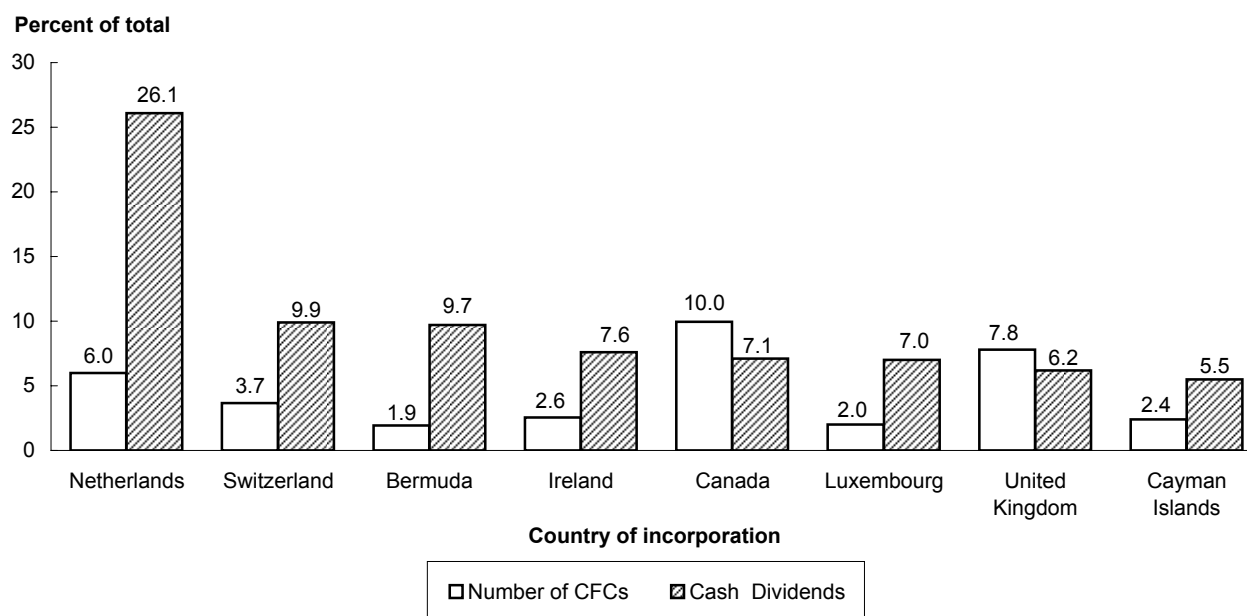


Figure F

Cash Dividends from CFCs, by Country of Incorporation



is relatively low, just 5.6 percent and 4.7 percent respectively, but they have the highest average cash and qualifying dividends.

The dramatic differences in the percentage of cash dividends qualifying for the deduction between Canada and the United Kingdom on one hand, and the other countries in Figure G is most likely due to taxpayers maximizing their foreign tax credit by carefully designating their specifically qualifying dividends from each of their CFCs. A firm with dividends from the United Kingdom and Bermuda would most likely designate Bermuda dividends as qualifying first, before any dividends from the United Kingdom, as Bermuda has a zero tax rate, and use dividends from the United Kingdom, to the extent possible, to match its base dividend amount.

This “cherry-picking” of dividends is more obvious in Figure H, which lists the ten countries of incorporation with the highest percentage of cash dividends qualifying for the deduction and the ten lowest. A substantial difference exists in these per-

centages. While almost 98 percent of the cash dividends from CFCs incorporated in Singapore qualified for the deduction, less than 10 percent from those incorporated in Japan qualified.

Revised Foreign Tax Credit

Although taxpayers could not credit any foreign taxes paid on the deductible portion of their qualifying dividends, they were permitted to credit those paid on the nondeductible portion. However, they were required to adjust their foreign tax credit on Form 8895 by computing an additional limitation based on the nondeductible portion. To compute this limitation, taxpayers subtracted the amount of the nondeductible dividends from each applicable income category from the original numerator and denominator of the ratio used to determine the original foreign tax credit limitation. Then, taxpayers multiplied the new ratio by U.S. income tax, less 35 percent (the highest U.S. corporate tax rate) of the nondeductible portion of the qualifying dividends. This new limitation was

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Figure G

Number of Returns and Average Repatriated Dividends, by Selected Countries of Incorporation

[Money amounts are in millions of dollars]

Country	Number of returns [1]	Average cash dividends	Average qualifying dividends	Qualifying dividends as a percentage of cash dividends
	(1)	(2)	(3)	(4)
All countries, total	843	429,260	370,492	86.3
Bermuda	47	744,130	676,572	90.9
Luxembourg	40	635,969	586,673	92.2
Netherlands	149	633,657	603,438	95.2
Switzerland	78	458,761	415,662	90.6
Ireland	68	405,699	376,180	92.7
Cayman Islands	55	361,700	335,522	92.8
United Kingdom	206	114,176	81,662	71.5
Canada	244	104,674	87,851	83.9

[1] Figures are greater than total because one company could have CFCs from multiple countries.

added to the foreign taxes attributed to the nondeductible qualifying dividends. Where the result was less than the original credit for the income category, it became the new credit.

Overall, taxpayers claiming the foreign tax credit attributed almost \$5 billion of foreign taxes to the nondeductible portion of their qualifying dividends. The ratio of these foreign taxes to the nondeductible portion of qualifying dividends for these returns is about 11.4 percent. Of the 582 taxpayers who reported a foreign tax credit, 168 or 28 percent reduced foreign tax credit by a total of about \$3.2 billion.

This reduction, however, comprised only 6.5 percent of the total foreign tax credit that otherwise would have been claimed for all corporations claiming the deduction. The manufacturing industry as a whole, as well as the wholesale and retail industry group, reported total revised foreign tax credits that were smaller than the sum of the foreign tax credits reported for those income categories with nondeductible dividends prior to the additional limitation computation. See Figure I.

Conclusions

A small number of mostly large corporations repatriated nearly \$362 billion from their controlled foreign corporations and deducted about \$265 billion of these dividends from their taxable incomes. The pharmaceutical and medicine manufacturing industry brought home roughly 29 percent of the repatriated dividends. CFCs engaged in pharmaceutical and medicine manufacturing or defined as bank holding or other holding companies together accounted for over half of the dividends, while CFCs incorporated in the Netherlands distributed over a quarter of the repatriated earnings. The differences in the percentage of cash dividends qualifying for the deduction from different countries of incorporation of the distributing CFC reflect the ability of taxpayers to specifically designate their qualifying dividends. Finally, much of the qualifying dividends have already been invested or will be invested shortly.

Figure H

Percentage of Cash Dividends Qualifying for the Deduction, by Country of Incorporation [1]

Top Ten Countries		Lowest Ten Countries	
Singapore	97.9	Brazil	52.0
Malaysia	97.8	Philippines	50.8
Netherlands	95.2	Italy	43.1
Hong Kong	94.0	South Korea	42.1
Cayman Islands	92.8	Argentina	35.8
Ireland	92.7	South Africa	32.6
Luxembourg	92.2	Taiwan	28.2
Bermuda	90.9	Colombia	27.4
Switzerland	90.6	India	26.5
Sweden	90.3	Japan	9.9

[1] Excludes countries reported by less than 25 parent returns.

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Figure I

Foreign Taxes and Tax Credit, by Selected Major and Minor Industry of Parent Corporation, Tax Years 2004-2006

[Money amounts in billions of dollars]

Industry	Foreign taxes paid on nondeductible dividends	Foreign tax credit from income categories with nondeductible dividends, prior to reduction	Revised total foreign tax credit
	(1)	(2)	(3)
All industries, total	5.0	47.5	45.8
Manufacturing	4.0	33.1	30.9
Computer and electronic equipment	0.8	5.8	4.8
Pharmaceutical and medicine	1.0	7.6	6.6
Wholesale and retail trade	0.2	1.5	1.4
Information	0.2	2.3	2.5
Finance, insurance, real estate, rental and leasing	0.1	1.3	1.6
Management of companies and enterprises	0.2	6.0	6.0
All other industries	0.2	3.4	3.4

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Table 1. Corporations Repatriating Dividends Under IRC Section 965, Selected Items, by Selected Major and Minor Industry of the Parent Corporation, Tax Years 2004-2006

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

Industry	Number of returns	Total assets	Repatriated cash dividends	Permanently reinvested foreign earnings or tax liability	Base dividends	Extraordinary dividends	Amount to be reinvested
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All industries	843	20,235,236,671	361,865,763	361,648,308	34,330,392	327,535,371	366,247,169
Manufacturing	465	5,926,326,466	289,434,055	308,368,140	28,668,489	260,765,566	284,846,024
Food manufacturing	24	453,270,185	21,259,177	20,538,355	3,300,379	17,958,798	18,235,166
Paper manufacturing	13	173,672,780	7,372,964	12,099,023	799,838	6,573,125	6,483,146
Chemical manufacturing	72	1,216,272,044	130,640,390	135,719,521	9,040,216	121,600,175	137,984,142
Basic chemical manufacturing	16	149,781,895	5,673,370	9,685,015	788,887	4,884,484	12,771,519
Pharmaceutical and medicine manufacturing	29	788,443,479	105,501,731	100,172,831	5,655,433	99,846,298	103,522,369
Plastics and rubber products manufacturing	22	26,890,552	878,015	2,001,671	66,837	811,178	1,120,639
Primary metal manufacturing	14	21,141,345	499,678	519,124	18,838	480,840	600,596
Fabricated metal product manufacturing	31	179,657,237	5,400,168	8,836,242	501,778	4,898,390	5,094,802
Machinery manufacturing	58	187,564,403	7,281,462	6,891,072	1,573,757	5,707,705	6,171,265
Computer and electronic equipment manufacturing	85	420,825,748	68,568,974	65,790,273	7,521,287	61,047,687	58,831,808
Computer and peripheral equipment manufacturing	15	168,163,168	40,425,437	41,215,300	4,298,593	36,126,845	34,518,842
Semiconductor and other electronic component manufacturing	34	124,443,774	15,673,419	12,022,604	1,875,488	13,797,931	13,739,298
Electrical equipment, appliance, and component manufacturing	26	1,275,992,225	6,192,622	18,026,042	1,468,737	4,723,886	4,610,393
Transportation equipment manufacturing	25	750,958,707	12,485,147	11,830,471	1,893,657	10,591,490	10,885,242
Wholesale and retail trade	133	308,617,862	14,701,616	11,920,018	787,402	13,914,213	17,731,878
Wholesale trade, durable goods	66	56,446,161	4,837,754	4,351,367	182,090	4,655,665	5,995,557
Wholesale trade, nondurable goods	37	148,932,907	4,864,940	2,641,181	455,759	4,409,181	3,937,242
Retail trade	30	103,238,794	4,998,921	4,927,471	149,554	4,849,367	7,799,080
Transportation and warehousing	16	22,598,502	984,276	268,983	54,724	929,551	1,137,622
Information	49	1,209,914,444	14,588,736	10,619,578	1,157,808	13,430,928	19,606,413
Software publishers	20	113,327,965	9,003,708	7,275,900	662,341	8,341,367	8,419,765
Finance, insurance, real estate, rental and leasing	49	3,506,103,932	13,322,012	14,587,457	856,131	12,465,881	17,146,634
Insurance carriers and related activities	26	1,151,469,380	3,580,266	4,022,714	349,941	3,230,325	5,026,597
Professional, scientific and technical services	38	97,396,690	3,132,531	1,726,208	236,865	2,895,666	3,792,149
Management of companies and enterprises	21	8,406,839,528	11,110,038	6,627,479	2,210,599	8,899,439	7,823,098
Other services	26	198,643,960	5,839,515	4,526,616	259,070	5,580,445	6,186,668
All other industries	47	558,795,287	8,752,985	3,003,828	99,304	8,653,681	7,976,653

Footnotes at end of table.

The One-Time Received Dividend Deduction

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Table 1. Corporations Repatriating Dividends Under IRC Section 965, Selected Items, by Selected Major and Minor Industry of the Parent Corporation, Tax Years 2004-2006—Continued

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

Industry	Increase of CFC debt to related parties [1]	Qualifying dividends	Section 965(2) amount of qualifying dividends	Deductible portion of qualifying dividends	Disallowed expenses per Section 965(d)(2)	Nondeductible dividends	Taxable income
	(8)	(9)	(10)	(11)	(12)	(13)	(14)
All industries	219,207	312,324,610	121,939,769	265,475,919	548,032	46,848,692	437,134,034
Manufacturing	133,066	252,251,369	106,008,496	214,413,664	401,013	37,837,705	230,905,964
Food manufacturing	45,152	17,637,518	14,769,651	14,991,890	40,560	2,645,628	24,121,111
Paper manufacturing	0	6,186,498	3,170,928	5,258,524	7,907	927,975	9,013,937
Chemical manufacturing	44,916	120,202,492	52,657,687	102,172,118	106,754	18,030,374	70,247,323
Basic chemical manufacturing	42,520	4,803,249	1,745,161	4,082,762	9,907	720,487	3,312,043
Pharmaceutical and medicine manufacturing	1,025	98,780,756	41,473,108	83,963,643	82,561	14,817,113	46,222,129
Plastics and rubber products manufacturing	738	796,360	52,471	676,906	2,136	119,454	661,083
Primary metal manufacturing	433	478,789	107,623	406,971	2,051	71,818	1,522,913
Fabricated metal product manufacturing	25,723	4,809,733	1,180,049	4,088,273	17,804	721,460	5,531,663
Machinery manufacturing	0	5,353,065	1,333,427	4,550,105	16,126	802,960	11,781,736
Computer and electronic equipment manufacturing	7,314	57,486,812	15,095,284	48,863,790	115,298	8,623,022	43,396,984
Computer and peripheral equipment manufacturing	0	34,199,356	5,652,342	29,069,453	52,688	5,129,903	17,069,606
Semiconductor and other electronic component manufacturing	969	13,569,819	2,978,105	11,534,346	27,029	2,035,473	18,204,156
Electrical equipment, appliance, and component manufacturing	72	4,100,543	813,713	3,485,461	10,211	615,081	9,300,886
Transportation equipment manufacturing	400	10,243,076	3,317,546	8,706,614	10,980	1,536,461	14,471,756
Wholesale and retail trade	59,171	12,860,439	6,148,203	10,931,373	23,769	1,929,066	21,271,046
Wholesale trade, durable goods	320	4,643,031	3,289,081	3,946,576	3,400	696,455	3,201,206
Wholesale trade, nondurable goods	60	3,910,565	1,289,171	3,323,981	6,397	586,585	10,925,645
Retail trade	58,791	4,306,843	1,569,951	3,660,816	13,972	646,026	7,144,195
Transportation and warehousing	1,490	918,156	102,306	780,432	1,151	137,723	712,008
Information	9,716	13,202,284	2,516,315	11,221,941	18,626	1,980,343	42,166,529
Software publishers	9,050	8,256,358	1,996,504	7,017,904	11,949	1,238,454	18,699,812
Finance, insurance, real estate, rental and leasing	1,652	11,915,338	2,474,093	10,128,037	29,734	1,787,301	27,724,547
Insurance carriers and related activities	0	2,738,175	1,034,004	2,327,449	3,227	410,726	13,189,999
Professional, scientific and technical services	13,632	2,739,979	478,005	2,328,982	8,504	410,997	3,155,735
Management of companies and enterprises	0	7,023,785	1,238,448	5,970,217	16,097	1,053,568	76,781,055
Other services	345	5,567,914	880,195	4,732,727	28,187	835,187	11,372,879
All other industries	135	5,845,347	2,093,709	4,968,545	20,952	876,802	23,044,271

Footnotes at end of table.

The One-Time Received Dividend Deduction

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Table 1. Corporations Repatriating Dividends Under IRC Section 965, Selected Items, by Selected Major and Minor Industry of the Parent Corporation, Tax Years 2004-2006—Continued

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

Industry	Taxable income excluding nondeductible dividends	Regular tax liability	Tax on nondeductible dividends	Foreign taxes paid on nondeductible dividends	Foreign tax credit from income categories with nondeductible dividends, prior to reduction	Revised foreign tax credit from income categories with nondeductible dividends	Revised total foreign tax credit
	(15)	(16)	(17)	(18)	(19)	(20)	(21)
All industries	390,285,342	152,903,345	16,351,875	4,965,264	47,547,294	44,343,165	45,781,955
Manufacturing	193,068,258	80,787,938	13,219,798	4,041,419	33,093,133	30,310,867	30,924,464
Food manufacturing	21,475,484	8,442,098	925,920	386,090	3,132,995	3,057,286	3,098,185
Paper manufacturing	8,085,962	3,150,140	324,702	215,923	1,065,587	1,059,538	1,085,600
Chemical manufacturing	52,216,949	24,568,567	6,290,249	1,595,271	11,889,971	10,581,490	10,664,895
Basic chemical manufacturing	2,591,556	1,156,106	249,062	218,496	656,609	616,175	617,966
Pharmaceutical and medicine manufacturing	31,405,016	16,180,286	5,185,878	1,023,540	7,648,067	6,568,165	6,594,828
Plastics and rubber products manufacturing	541,629	231,174	41,684	24,169	67,597	63,545	63,746
Primary metal manufacturing	1,451,094	532,672	25,061	10,314	32,297	30,599	37,948
Fabricated metal product manufacturing	4,810,203	1,935,325	252,071	110,907	510,645	508,018	508,377
Machinery manufacturing	10,978,776	4,123,065	280,733	107,780	1,563,377	1,482,531	1,486,755
Computer and electronic equipment manufacturing	34,773,963	15,187,457	3,016,927	797,449	5,755,880	4,637,583	4,769,491
Computer and peripheral equipment manufacturing	11,939,702	5,974,184	1,795,288	538,310	3,302,096	2,557,065	2,608,681
Semiconductor and other electronic component manufacturing	16,168,683	6,370,607	711,858	76,843	1,627,764	1,499,367	1,544,587
Electrical equipment, appliance, and component manufacturing	8,685,804	3,254,682	215,151	128,188	2,105,009	2,082,162	2,258,405
Transportation equipment manufacturing	12,935,294	5,064,666	537,484	313,421	2,163,724	2,075,550	2,137,939
Wholesale and retail trade	19,341,980	7,404,135	674,536	244,561	1,484,019	1,343,797	1,392,947
Wholesale trade, durable goods	2,504,751	1,119,983	243,569	103,417	258,472	190,539	198,191
Wholesale trade, nondurable goods	10,339,060	3,823,281	205,060	61,758	1,006,176	962,546	1,002,651
Retail trade	6,498,169	2,460,871	225,907	79,386	219,371	190,712	192,105
Transportation and warehousing	574,284	248,944	48,006	16,436	95,197	86,795	91,002
Information	40,186,186	14,753,979	690,211	168,268	2,266,678	2,220,678	2,492,723
Software publishers	17,461,358	6,544,779	433,370	127,185	1,636,303	1,590,836	1,856,955
Finance, insurance, real estate, rental and leasing	25,937,247	9,702,854	625,440	142,931	1,307,412	1,285,051	1,597,177
Insurance carriers and related activities	12,779,273	4,615,975	143,746	48,293	549,739	527,672	817,387
Professional, scientific and technical services	2,744,738	1,103,870	143,442	45,636	271,627	252,243	276,417
Management of companies and enterprises	75,727,487	26,873,319	368,747	154,084	6,020,784	5,900,926	5,967,594
Other services	10,537,692	3,980,425	292,251	119,527	624,243	575,825	578,650
All other industries	22,167,469	8,047,883	289,444	32,401	2,384,203	2,366,982	2,460,981

[1] CFC refers to Controlled Foreign Corporations.

The One-Time Received Dividend Deduction

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Table 2. Cash and Qualifying Dividends Repatriated from Controlled Foreign Corporations (CFCs) under IRC Section 965, by Selected Major and Minor Industry of CFCs, Tax Years 2004-2006

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

Industry	CFCs		Cash dividends		Qualifying dividends	
	Number	Percent of total	Amount	Percent of total	Amount	Percent of total
	(1)	(2)	(3)	(4)	(5)	(6)
All industries	4,246	100.0	361,865,763	100.0	312,324,610	100.0
Manufacturing	1,361	32.1	168,778,901	46.6	156,501,699	50.1
Food manufacturing	85	2.0	3,027,713	0.8	1,701,897	0.5
Paper manufacturing	45	1.1	1,845,862	0.5	1,631,208	0.5
Chemical manufacturing	328	7.7	101,875,842	28.2	96,991,714	31.1
Pharmaceutical and medicine manufacturing	103	2.4	88,129,425	24.4	84,879,206	27.2
Plastics and rubber products manufacturing	69	1.6	1,173,585	0.3	1,114,902	0.4
Primary metal manufacturing	12	0.3	358,466	0.1	348,780	0.1
Fabricated metal product manufacturing	83	2.0	933,472	0.3	710,080	0.2
Machinery manufacturing	91	2.1	1,352,408	0.4	974,981	0.3
Computer and electronic equipment manufacturing	133	3.1	28,314,792	7.8	26,324,607	8.4
Electrical equipment, appliance, and component manufacturing	116	2.7	2,226,020	0.6	2,066,043	0.7
Transportation equipment manufacturing	75	1.8	3,611,100	1.0	3,126,145	1.0
Wholesale and retail trade	739	17.4	23,109,708	6.4	16,592,173	5.3
Wholesale trade, durable goods	331	7.8	10,785,022	3.0	6,918,894	2.2
Wholesale trade, nondurable goods	333	7.8	7,479,505	2.1	5,965,437	1.9
Retail trade	64	1.5	4,698,525	1.3	3,561,369	1.1
Transportation and warehousing	58	1.4	725,578	0.2	609,239	0.2
Information	122	2.9	9,972,791	2.8	9,368,500	3.0
Finance, insurance, real estate, rental and leasing	386	9.1	20,786,780	5.7	16,588,295	5.3
Insurance carriers and related activities	98	2.3	2,611,661	0.7	1,833,496	0.6
Securities, commodity contracts, and other financial investments	160	3.8	10,475,526	2.9	9,231,920	3.0
Professional, scientific and technical services	304	7.2	13,006,187	3.6	8,991,906	2.9
Computer systems design and related services	122	2.9	8,437,265	2.3	4,858,061	1.6
Management of companies and enterprises	509	12.0	97,703,288	27.0	82,611,194	26.5
All other industries	768	18.1	27,782,529	7.7	21,061,605	6.7

The One-Time Received Dividend Deduction

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Table 3. Cash and Qualifying Dividends Repatriated from Controlled Foreign Corporations (CFCs) under IRC Section 965, by Selected CFCs Country of Incorporation, Tax Years 2004-2006

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

Selected country of incorporation	CFCs		Cash dividends		Qualifying dividends	
	Number	Percentage of total	Amount	Percentage of total	Amount	Percentage of total
	(1)	(2)	(3)	(4)	(5)	(6)
All countries	4,246	100.0	361,865,763	100.0	312,324,610	100.0
Argentina	33	0.8	135,546	[1]	48,562	[1]
Australia	142	3.3	3,450,387	1.0	2,551,608	0.8
Austria	31	0.7	546,646	0.2	490,293	0.2
Bahamas	24	0.6	3,380,003	0.9	1,995,072	0.6
Belgium	58	1.4	1,313,047	0.4	790,548	0.3
Bermuda	82	1.9	34,974,125	9.7	31,798,882	10.2
Brazil	87	2.0	1,176,939	0.3	612,444	0.2
British Virgin Islands	20	0.5	2,230,704	0.6	2,108,849	0.7
Canada	426	10.0	25,540,545	7.1	21,435,573	6.9
Cayman Islands	101	2.4	19,893,521	5.5	18,453,692	5.9
Chile	24	0.6	235,553	0.1	137,776	[1]
China	96	2.3	2,521,662	0.7	2,265,543	0.7
Colombia	32	0.8	82,173	[1]	22,491	[1]
Costa Rica	22	0.5	295,376	0.1	248,172	0.1
Czech Republic	17	0.4	270,742	0.1	193,066	0.1
Denmark	24	0.6	336,081	0.1	278,439	0.1
Dominican Republic	12	0.3	66,011	[1]	63,878	[1]
El Salvador	16	0.4	75,854	[1]	74,180	[1]
Finland	11	0.3	149,790	[1]	50,918	[1]
France	56	1.3	3,154,213	0.9	2,605,876	0.8
Germany	100	2.4	3,505,274	1.0	2,722,850	0.9
Greece	18	0.4	110,354	[1]	24,551	[1]
Guatemala	18	0.4	62,826	[1]	43,412	[1]
Hong Kong	163	3.8	5,510,881	1.5	5,180,664	1.7
Honduras	20	0.5	147,444	[1]	145,771	[1]
Hungary	15	0.4	336,898	0.1	301,401	0.1
India	60	1.4	750,961	0.2	198,654	0.1
Indonesia	24	0.6	50,592	[1]	171	0.0
Ireland	112	2.6	27,587,513	7.6	25,580,241	8.2
Israel	12	0.3	498,466	0.1	433,820	0.1
Italy	47	1.1	1,952,900	0.5	842,286	0.3
Japan	143	3.4	5,005,973	1.4	497,514	0.2
Luxembourg	87	2.0	25,438,746	7.0	23,466,908	7.5
Malaysia	62	1.5	4,156,431	1.1	4,064,262	1.3
Mexico	163	3.8	3,791,863	1.0	2,745,736	0.9
Netherlands	253	5.9	94,414,845	26.1	89,912,245	28.8
New Zealand	42	1.0	603,595	0.2	410,662	0.1
Norway	12	0.3	187,085	0.1	145,173	[1]
Panama	22	0.5	801,743	0.2	785,841	0.3
Philippines	39	0.9	370,914	0.1	188,283	0.1
Poland	29	0.7	281,540	0.1	66,847	[1]
Portugal	22	0.5	136,500	0.0	45,999	[1]
Puerto Rico	22	0.5	3,085,915	0.9	3,003,321	1.0
Saudi Arabia	16	0.4	46,664	0.0	38,437	[1]
Singapore	89	2.1	5,518,171	1.5	5,401,243	1.7
South Africa	62	1.5	492,061	0.1	160,409	0.1
South Korea	76	1.8	1,192,889	0.3	502,347	0.2
Spain	77	1.8	3,023,295	0.8	1,824,308	0.6
Sweden	51	1.2	2,269,547	0.6	2,048,523	0.7
Switzerland	155	3.7	35,783,325	9.9	32,421,610	10.4
Taiwan	46	1.1	1,334,440	0.4	376,960	0.1
Thailand	64	1.5	702,115	0.2	548,888	0.2
Turkey	12	0.3	178,519	0.0	10,630	[1]
United Kingdom	330	7.8	22,264,330	6.2	15,924,015	5.1
Venezuela	20	0.5	181,911	0.1	77,402	[1]
All other countries	450	10.6	10,260,318	2.8	5,957,365	1.9

[1] Less than 0.05 percent

Federal Estate Tax Returns Filed for 2004 Decedents

By Brian G. Raub

An estimated 42,239 Federal estate tax returns (Forms 706) were filed for 2004 decedents, a 61-percent decrease from the 109,562 returns filed for decedents who died in 2001, the last year for which a comparable estimate was made.¹ This decrease is largely the result of the Economic Growth and Tax Relief Reconciliation Act of 2001 (EGTRRA), which increased the filing threshold from \$675,000 for 2001 deaths to \$1.5 million for 2004 deaths.

Estate tax returns filed for 2004 decedents with gross estates above \$1.5 million reported a combined \$185.9 billion in total gross estate. The largest asset type in the overall portfolio of these decedents was publicly traded stock, valued at \$51.5 billion, followed by investment real estate and tax-exempt bonds, valued at \$27.2 billion and \$18.3 billion, respectively. Estates also reported about \$3.0 billion of assets held in family limited partnership interests (FLPs). Valuation discounts taken against total assets accounted for \$6.5 billion. Of this total, \$3.5 billion were reported on assets held in FLPs.

Approximately 20.6 percent of returns filed for 2004 decedents reported a bequest to charity. Larger estates were more likely to report a charitable bequest and, on average, left a larger share of total gross estate to charity. After accounting for charitable bequests, marital bequests, and other deductions and credits, about 45.7 percent of returns filed for 2004 decedents reported estate tax liability. These 19,294 returns combined reported \$22.2 billion in net estate tax.

Background: Federal Transfer Tax Law and EGTRRA of 2001

The Federal estate tax, the gift tax, and the generation-skipping transfer tax compose the Federal transfer tax system. The Federal estate tax, passed into law with the Revenue Act of 1916 and described in Internal Revenue Code (IRC) section 2001, is neither a tax on property nor an inheritance tax on the receipt of property. Rather, the estate tax is a tax on the right to transfer property at death. For deaths that oc-

curred in 2004, the filing threshold for property transfers at death was \$1.5 million in total gross estate.

The gift tax, applied to lifetime transfers of property, was imposed by the Revenue Act of 1932, in part to prevent estate tax avoidance. Prior to passage of the 1932 Act, individuals could transfer assets during life and thereby avoid estate taxation at death. Under current law, an individual may give up to \$12,000 per year to any number of recipients with no Federal gift tax liability.

The generation-skipping transfer (GST) tax, imposed by the Tax Reform Act (TRA) of 1976 and later modified by the 1986 Tax Reform Act, ensures that the transmission of hereditary wealth is taxed at each generational level. This additional tax is applied to the value of property transferred to an individual or individuals two or more generations below that of the decedent. The creation of GST trusts, distributions from the principal of trusts, and the termination of income interests are taxable events under generation-skipping transfer tax law.

Direct transfers are also taxable under GST law. Qualifying transfers in excess of \$1.5 million are currently subject to the generation-skipping transfer tax. On passage of TRA of 1976, estate and gift taxes shared a unified framework of graduated and progressive tax rates, while the generation-skipping transfer tax applied the maximum Federal estate tax rate to taxable generation-skipping transfers.

With the Economic Growth and Tax Relief Reconciliation Act (EGTRRA) of 2001, Congress made significant changes to the Federal transfer tax framework. Most noteworthy, of course, was lawmakers' decision to eventually repeal the estate tax, as well as the generation-skipping transfer tax. The exemption amount for estates increased from \$675,000 for 2001 deaths to \$1.0 million for 2002 deaths to \$1.5 million for 2004 deaths (Figure A). The exemption increased to \$2.0 million for 2006 deaths and will rise to \$3.5 million for 2009 deaths. For 2010 deaths, no estate tax will apply.

The highest estate and GST tax rate will decrease from 55 percent for 2001 deaths to 45 percent for deaths in 2007-2009. The lifetime GST exemption remained at \$1.0 million, adjusted for inflation, until 2004 when the GST exemption became equal to the estate tax exemption of \$1.5 million; the two

Brian G. Raub is an economist with the Special Studies Special Projects Section. This article was prepared under the direction of Barry W. Johnson, Chief.

¹ See "Which Estates are Affected by the Federal Estate Tax?: An Examination of the Filing Population for Year-of-Death 2001" *Statistics of Income Bulletin*, Summer 2005, Volume 25, Number 1.

Federal Estate Tax Returns Filed for 2004 Decedents

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Figure A

Federal Transfer Tax Rates and Exemptions, by Year of Transfer, 2001-2011

Year of transfer	Estate tax exemption (\$)	Generation-skipping transfer (GST) tax exclusion (\$)	Highest estate and GST tax rate (percent)	Gift tax exemption (\$)	Highest gift tax rate (percent)
	(1)	(2)	(3)	(4)	(5)
2001	675,000	675,000	55	675,000	55
2002	1,000,000	1,000,000	50	1,000,000	50
2003	1,000,000	1,000,000	49	1,000,000	49
2004	1,500,000	1,500,000	48	1,000,000	48
2005	1,500,000	1,500,000	47	1,000,000	47
2006	2,000,000	2,000,000	46	1,000,000	46
2007	2,000,000	2,000,000	45	1,000,000	45
2008	2,000,000	2,000,000	45	1,000,000	45
2009	3,500,000	3,500,000	45	1,000,000	45
2010	Repealed	Repealed	Repealed	1,000,000	35
2011	1,000,000	1,000,000	55	1,000,000	35

exemptions will remain equal through 2009. Under EGTRRA, the lifetime exemption for gifts increased from \$675,000 in 2001 to \$1.0 million for gifts given in 2002, and will remain at \$1.0 million through 2010 and beyond, since Congressional lawmakers did not repeal the Federal gift tax. EGTRRA includes a “sunset” requirement, which effectively means that all provisions set forth in the 2001 Act will expire after December 31, 2010.

Tax Law in Effect for 2004 Deaths

The estate of a decedent who, at death, owns assets valued in excess of the estate tax applicable exemption amount, or filing threshold, must file Form 706, *U.S. Estate (and Generation-Skipping Transfer) Tax Return*. For decedents who died in 2004, the exemption amount was \$1.5 million. For estate tax purposes, the value of property included in gross estate is fair market value (FMV), defined as “the price at which the property would change hands between a willing buyer and a willing seller, neither being under any compulsion to buy or to sell and both having reasonable knowledge of all relevant facts,” according to Regulation 20.2031-1(b) of the IRC.

The gross estate consists of all property, whether real or personal, tangible or intangible, including “all property in which the decedent had an interest at the time of his or her death and certain property transferred during the lifetime of the decedent without

adequate consideration; certain property held jointly by the decedent with others; property over which the decedent had a general power of appointment; proceeds of certain insurance policies on the decedent’s life; dower or curtesy of a surviving spouse; and certain life estate property for which the marital deduction was previously allowed.” Specific items of gross estate include real estate, cash, stocks, bonds, businesses, and decedent-owned life insurance policies, among others.

Assets of gross estate are valued on a decedent’s date of death, unless the estate’s executor or administrator elects to value assets on an alternate valuation date, 6 months from the date of death, as described in IRC section 2032. Alternate value may be elected only if the value of the estate, as well as the estate tax, is reduced between the date of death and the alternate date. The estate tax return is due 9 months from the date of the decedent’s death, although a 6-month extension is commonly allowed.

Decedent Profile

In 2004, an estimated 42,239 individuals died with gross estates above the estate tax exemption amount of \$1.5 million. These decedents represented 0.02 percent of the adult population of the United States, and their deaths represented about 1.8 percent of all adult deaths occurring in that year.² Males made up 56.2 percent of the 2004 estate tax decedent popula-

² U.S. population data obtained from www.census.gov, and data on U.S. deaths obtained from the National Center for Health Statistics at www.cdc.gov/nchs/fastats/deaths.htm.

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tion, although they represented slightly less than half of both the living population and adult deaths during 2004. Male decedents owned more than \$110 billion, or 59.3 percent, of total gross estate reported on all estate tax returns filed for 2004 decedents (Figure B). The estates of male decedents comprised an average of \$4.65 million in total gross estate, although this varied by marital status.

Figure B

Total Gross Estate, Tax Purposes, by Sex and Marital Status, 2004 Estate Tax Decedents

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

Marital status	Male decedents		Female decedents	
	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)
Total	23,746	110,300,153	18,493	75,621,227
Married	14,903	72,040,080	4,678	20,977,505
Widow or widowed	5,631	26,213,004	11,361	46,686,596
Single	1,851	6,415,869	1,154	3,547,902
Other [1]	1,362	5,631,200	1,300	4,409,223

[1] "Other" includes decedents who were legally separated or divorced at the time of their deaths, as well as decedents whose marital status was unknown.

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

Married men, who made up 62.8 percent of the total, had the largest average estate, \$4.83 million. Estates of single men, which represented only 7.8 percent of the total, reported the smallest average estate, \$3.47 million. Not surprisingly, almost 98.3 percent of the estates of married men reported a deduction for a bequest to a surviving spouse. These deductions totaled \$45.6 billion, or 63.3 percent of combined gross estate. Consequently, only 9.1 percent of returns filed for married males reported a tax liability.

Female decedents made up 43.8 percent of the 2004 estate tax population, and their estates reported a combined \$75.6 billion in total gross estate, about 40.7 percent of the total reported on all returns. These estates reported an average gross estate of \$4.09 million, although, like estates for their male counterparts, this average varied by marital status.

The majority of female decedents, 61.4 percent, were widowed, and estates for these decedents reported an average of \$4.11 million in total gross estate. Only 25.3 percent of female decedents were married, although these women had the largest average gross estate, \$4.48 million.

As shown in Figure C, both male and female estate tax decedents outlived their counterparts in the general population. The average age at death for men in the 2004 estate tax decedent population was 77.2, compared to 75.2 for men in the general population, while the averages for women were 82.0 and 80.4, respectively. This is consistent with research demonstrating that wealthier individuals live longer and are healthier than less wealthy individuals.³

Figure C also shows the increasing longevity of both the estate tax decedent population and the general population over the past 12 years, particularly for men. In 1992, male estate tax decedents were 74.6 years old on average, about 2 ½ years younger than the average in 2004. For female estate tax decedents, the increase in longevity was slightly smaller, as female estate tax decedents in 1992 were an average of 80.2 years old, just less than 2 years younger than the average in 2004.

Occupation and Industry

The usual occupation and industry in which a decedent worked, whether actively working or retired at death, is reported on the Federal estate tax return and on most State-issued death certificates.⁴ Figure D shows that the majority of decedents in the 2004 estate tax population were employed in management and professional occupations. The single most common occupation was chief executive, reported for 3,339 decedents, nearly 8 percent of all decedents. Decedents employed in healthcare occupations made up the second largest group, 6.6 percent, followed by teachers, librarians, and curators, who combined for 6.2 percent of the total. Sales supervisors, salespeople, and other administrative occupations each made up about 5 percent of the total, while jobs as engineers, architects, and surveyors made up a little more than 4 percent of the total.

³ See, for example, Menchik, Paul (1991), "Economic Status as a Determinant of Mortality Among Nonwhite and White Older Males; or, Does Poverty Kill?" Institute for Research on Poverty, Discussion Paper Number 93891.

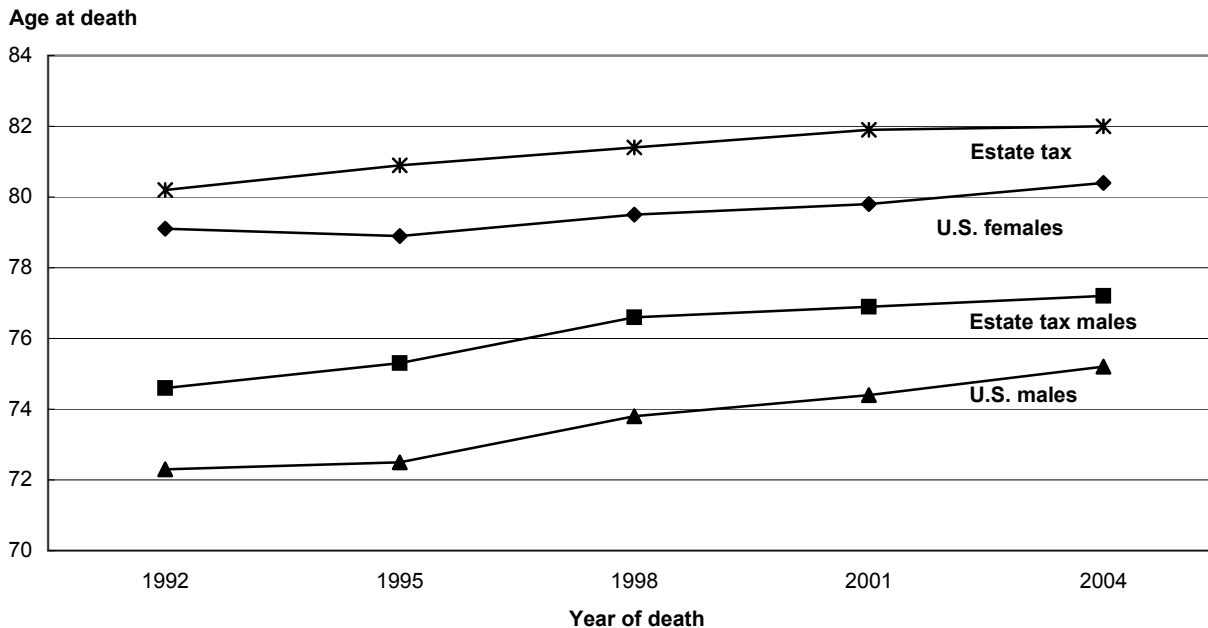
⁴ Occupation and industry were classified using industrial and occupation classification systems developed by the U.S. Census Bureau for the 2000 Census of Population and Housing. Occupation was coded as "unknown or none" for 23.2 percent of all decedents. A significant portion of these cases were reported on the estate tax return or death certificate as either "retired," or "homemaker." Industry was coded as "unknown or none" for 24.1 percent of all decedents.

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Figure C

Average Age at Death for Estate Tax and U.S. Decedents, Selected Years of Death, 1992-2004



NOTE: Life expectancy data produced by the National Center for Health Statistics, U.S. Department of Health and Human Services. See <http://www.cdc.gov/nchs/fastats/deaths.htm>.

Decedents employed in financial and management occupations had the highest average gross estates, \$6.1 million and \$5.8 million, respectively. These averages were significantly higher than the average for the entire 2004 decedent population, \$4.4 million. Among those in the management occupation group, chief executives had the highest average gross estate, \$7.9 million. Conversely, decedents employed in each of the other broad occupation groups had average gross estates below the overall average, \$4.4 million. Decedents employed in administrative support reported the lowest average gross estate, \$2.7 million.

Figure D also shows that the distribution of occupation varies significantly for decedents in different gross estate size classes. For example, while 22.2 percent of decedents from estates with less than \$3.5 million in gross estate were employed in management, the comparable figure for decedents from estates with \$3.5 million or more in gross estate was 30.1 percent. Within this broad group, chief executives made up 6.7 percent of the decedents from estates with less than \$3.5 million but 11.2 percent

of decedents from estates with \$3.5 million or more. Significant differences also exist for lawyers and judges, who made up 3.2 percent of decedents from estates with less than \$3.5 million but 4.7 percent from estates with \$3.5 million or more.

As shown in Figure E, the distribution of industries in which decedents were employed also varies by size of gross estate. Overall, the most common industry group for decedents was education, health, and social services, 13.8 percent, followed by finance, insurance, and real estate (FIRE), 10.4 percent. For decedents from estates with \$3.5 million or more in gross estate, however, the FIRE industry group was more common, 13.5 percent of the total, while decedents employed in the education, health, and social services group made up only 12.2 percent of the total. Decedents employed in the professional services industry group made up a slightly higher percentage of the total for estates with \$3.5 million, 10.8 percent, than for estates with less than \$3.5 million, 9.3 percent.

These differences are reflected in the average size of gross estate across industry groups, shown

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Figure D

Selected Occupations, by Size of Gross Estate, 2004 Estate Tax Decedents

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

Occupation	All decedents			Size of total gross estate, tax purposes			
				Less than \$3.5 million		\$3.5 million or more	
	Number	Percent of total	Average gross estate, tax purposes	Number	Percent	Number	Percent
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Total	42,239	100.0	4,402	30,840	100.0	11,399	100.0
Management occupations	10,275	24.3	5,806	6,841	22.2	3,434	30.1
Chief executives	3,339	7.9	7,922	2,061	6.7	1,278	11.2
Financial managers	499	1.2	6,142	311	1.0	188	1.6
Farm and ranch managers	1,233	2.9	3,711	989	3.2	244	2.1
Real estate managers	1,021	2.4	6,505	559	1.8	462	4.1
Business and financial occupations	1,953	4.6	6,131	1,441	4.7	512	4.5
Accountants and auditors	700	1.7	2,980	587	1.9	113	1.0
Professional occupations	10,800	25.6	3,729	8,070	26.2	2,730	23.9
Engineers, architects, surveyors	1,720	4.1	3,231	1,422	4.6	298	2.6
Scientists and social scientists	620	1.5	4,116	497	1.6	123	1.1
Lawyers and judges	1,526	3.6	4,350	987	3.2	539	4.7
Teachers, librarians, curators	2,636	6.2	3,093	2,100	6.8	536	4.7
Writers, artists, entertainers, athletes	1,015	2.4	5,105	705	2.3	310	2.7
Healthcare occupations	2,775	6.6	3,705	1,955	6.3	820	7.2
Service occupations	557	1.3	2,798	453	1.5	104	0.9
Sales and office occupations	6,125	14.5	3,679	4,706	15.3	1,419	12.4
Sales supervisors	1,984	4.7	4,226	1,409	4.6	575	5.0
Other sales occupations	2,092	5.0	4,115	1,561	5.1	531	4.7
Administrative support	2,049	4.9	2,703	1,736	5.6	313	2.7
Farming, fishing and forestry occupations	418	1.0	3,116	345	1.1	73	0.6
Construction occupations	862	2.0	3,139	697	2.3	165	1.4
Construction and extraction supervisors	202	0.5	4,277	132	0.4	70	0.6
Production and transportation occupations	1,452	3.4	3,449	1,196	3.9	256	2.2
Other [1]	9,797	23.2	4,175	7,091	23.0	2,706	23.7

[1] Includes decedents whose occupation was reported as "homemaker" or "retired", or for whom an occupation was not reported.

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

in column 3 of Figure E. Estates for decedents employed in FIRE reported the highest average gross estate, \$5.54 million, followed by professional services, \$5.16 million. In contrast, decedents employed in the education, health, and social services industry group had an average gross estate of only \$3.87 million.

Asset Portfolios

In accordance with IRS rules and to substantiate reported values of total gross estate, estate tax return preparers must report inventories of decedents' asset portfolios on Federal estate tax returns. Consequently, these returns provide a rich source of data on the asset holdings of decedents. For estate tax purposes,

the value of property included in gross estate is fair market value (FMV). Reported asset values may be reduced from FMV by the use of valuation discounts for certain characteristics or qualities like minority ownership or lack of marketability.⁵ The estimates reported in this section are postdiscount estimates, i.e., after the value of ownership interests have been reduced by any discounts.

Of the \$185.9 billion in total gross estate reported by estates for 2004 decedents, the largest share, 27.7 percent, was held in publicly traded stock (Figure F). Investment real estate accounted for the second-largest share, 12.8 percent of the total, followed by tax-exempt bonds and cash assets, 9.9 percent and 9.4 percent, respectively. As shown in Figure F,

⁵ Valuation discounts are generally reported on assets associated with a privately held business. Minority ownership discounts are based on the principle that holding a fractional, noncontrolling share in a business reduces the real economic value of that ownership share. Lack of marketability discounts is based on the related principle that an illiquid market exists for fractional, noncontrolling shares in a business, thus making those shares more difficult to sell and reducing their values.

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Figure E

Selected Industries, by Size of Gross Estate, 2004 Estate Tax Decedents

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

Industry	All decedents			Size of total gross estate, tax purposes			
				Less than \$3.5 million		\$3.5 million or more	
	Number	Percent of total	Average gross estate, tax purposes	Number	Percent	Number	Percent
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Total	42,239	100.0	4,402	30,840	100.0	11,399	100.0
Education, health, social services	5,816	13.8	3,873	4,425	14.3	1,391	12.2
Finance, insurance, real estate	4,387	10.4	5,544	2,845	9.2	1,542	13.5
Manufacturing	4,310	10.2	4,827	3,144	10.2	1,166	10.2
Professional services	4,117	9.7	5,162	2,883	9.3	1,234	10.8
Retail trade	3,013	7.1	3,734	2,224	7.2	789	6.9
Agriculture	2,055	4.9	3,734	1,605	5.2	450	3.9
Public administration, military	1,452	3.4	3,251	1,218	3.9	234	2.1
Construction	1,357	3.2	4,122	967	3.1	390	3.4
Wholesale trade	1,322	3.1	4,423	934	3.0	388	3.4
Information	1,137	2.7	4,898	890	2.9	247	2.2
Other services	1,124	2.7	3,404	932	3.0	192	1.7
Arts, entertainment, accommodation	1,064	2.5	4,510	702	2.3	362	3.2
Transportation	904	2.1	3,798	699	2.3	205	1.8
Other [1]	10,181	24.1	4,351	7,372	23.9	2,809	24.6

[1] Includes decedents whose occupation was reported as "homemaker" or "retired", or for whom an industry was not reported.

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

the asset distribution of decedents' portfolios varied significantly by size of total gross estate. In some figures and text below, estates are classified by size of total gross estate into three categories: small (estates with less than \$3.5 million in gross estate), medium (estates with at least \$3.5 million but less than \$5 million in gross estate), and large (estates with \$5 million or more in gross estate).

Several asset types, including publicly traded and closely held stock, and limited partnerships, accounted for increasingly large portions of the portfolios as estate size increased. Publicly traded stock made up 22.5 percent of the portfolio of small estates, compared with 25.7 percent of medium estates and 31.6 percent of large estates. Similarly, closely held stock made up only 2.3 percent of small estates, compared with 4.8 percent of medium estates and 10.2 percent of large estates. Limited partnerships accounted for 1.0 percent of small estates but 1.4 percent of medium estates and 3.9 percent of large estates. In contrast, cash assets, personal residences, and retirement assets made up less significant parts of the portfolio as estate size increased.

As shown in Figure G, the asset composition of estates also varied significantly by the sex and age

of decedents. Overall, publicly traded stock was the largest asset type for both male and female decedents, although female decedents, on average, held more of their portfolios in this asset type, 33.1 percent, than their male counterparts, 24.0 percent. For both men and women, publicly traded stock made up a larger percentage of the portfolio of older decedents than of younger decedents. For the youngest female decedents (under age 50), this asset made up only 15.4 percent of total gross estate, compared to 19.3 percent for middle-age decedents (ages 50 through 64), and 34.3 percent for older decedents (ages 65 and over).

The same pattern can be observed for male decedents. Female decedents also held more of their portfolios in tax-exempt bonds (11.2 percent), cash assets (10.3 percent), and personal residences (9.5 percent) than their male counterparts. Like publicly traded stock, tax-exempt bonds accounted for a larger percentage of the portfolio of older decedents, for both men and women. For the youngest female decedents, this asset type made up 4.5 percent of total gross estate, compared to 6.4 percent for middle-age decedents, and 11.7 percent for older decedents. A similar pattern can be observed for male decedents.

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Figure F

Assets, by Size of Gross Estate, 2004 Estate Tax Decedents

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

Asset type	All		Size of total gross estate, tax purposes					
			Small (less than \$3.5 million)		Medium (\$3.5 million < \$5 million)		Large (\$5 million or more)	
	Amount	Percent of total gross estate	Amount	Percent of total gross estate	Amount	Percent of total gross estate	Amount	Percent of total gross estate
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Total gross estate, tax purposes	185,921,379	100.0	66,743,074	100.0	19,668,543	100.0	99,509,762	100.0
Publicly traded stock	51,504,154	27.7	15,013,099	22.5	5,055,150	25.7	31,435,905	31.6
Investment real estate [1]	23,706,697	12.8	9,018,946	13.5	2,753,740	14.0	11,934,011	12.0
Tax-exempt bonds	18,334,701	9.9	5,750,224	8.6	1,996,493	10.2	10,587,984	10.6
Cash assets	17,499,097	9.4	8,073,837	12.1	1,993,789	10.1	7,431,472	7.5
Personal residence	15,857,140	8.5	8,942,152	13.4	1,962,331	10.0	4,952,657	5.0
Closely held stock	12,647,000	6.8	1,527,359	2.3	952,068	4.8	10,167,573	10.2
Retirement assets	12,597,616	6.8	7,079,038	10.6	1,711,059	8.7	3,807,519	3.8
Limited partnerships	4,852,973	2.6	668,438	1.0	280,847	1.4	3,903,688	3.9
Farms [2]	4,807,250	2.6	2,329,827	3.5	462,126	2.3	2,015,297	2.0
Federal bonds	4,569,550	2.5	1,734,080	2.6	498,832	2.5	2,336,638	2.3
Insurance [3]	3,942,336	2.1	2,337,331	3.5	575,485	2.9	1,029,520	1.0
Mortgages and notes	3,919,863	2.1	991,715	1.5	485,267	2.5	2,442,881	2.5
Other financial assets	3,897,522	2.1	1,709,589	2.6	390,379	2.0	1,797,554	1.8
Noncorporate business assets	2,995,577	1.6	487,952	0.7	159,266	0.8	2,348,359	2.4
Other assets	4,789,903	2.6	1,079,487	1.6	391,713	2.0	3,318,704	3.3

[1] Includes undeveloped land, real estate mutual funds, real estate partnerships, and other investment real estate.

[2] Includes farm land.

[3] Value is shown net of policy loans.

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

Male decedents held more of their portfolios in closely held stock (8.5 percent), retirement assets (8.6 percent), limited partnerships (3.2 percent), and insurance (3.1 percent) than their female counterparts. For both male and female decedents, closely held stock accounted for a larger percentage of the portfolio of younger decedents than older decedents. For the youngest male decedents, this asset type made up 13.4 percent of total gross estate, compared to 12.6 percent for middle-aged decedents, and 7.8 percent for older decedents.

A similar pattern can be seen for their female counterparts. Insurance also accounted for a much larger percentage of the portfolios of younger decedents of both sexes. For example, insurance made up an average of 21.5 percent of the estates of the youngest male decedents, compared to 10.2 percent for middle-age decedents, and 1.6 percent for older male decedents. This finding is consistent with research suggesting that households headed by older individuals tend to purchase less life insurance due to

higher premiums and substitution with other financial assets.⁶

Estates with Family Limited Partnership Interests

For business owners across all sectors of the U.S. economy, especially in oil and gas, real estate, and equipment leasing, the limited partnership is a common organizational and legal entity. The limited partnership consists of a general partner, who manages daily business activity and assumes much of the financial burden of the business, and limited partners, who invest capital in the business but have limited liability.

While family-owned businesses are frequently organized as limited partnerships, wealth management and estate planning professionals have advocated use of the entities as tax shelters for family wealth. In these family limited partnerships (FLPs), which may hold a variety of assets, including com-

⁶ See, for example, Showers, Vince and Joyce Shotick (1994), "The Effects of Household Characteristics on Demand for Insurance," *The Journal of Risk and Insurance*, Volume 61, Number 3.

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Figure G

Assets, by Age at Death and Sex, 2004 Estate Tax Decedents

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

Asset type	All male decedents		Age of male decedents					
			Under 50		50 under 65		65 and older	
	Amount	Percent of total gross estate	Amount	Percent of total gross estate	Amount	Percent of total gross estate	Amount	Percent of total gross estate
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Total gross estate, tax purposes	110,300,153	100.0	2,616,037	100.0	13,129,611	100.0	94,554,505	100.0
Publicly traded stock	26,451,686	24.0	279,349	10.7	1,652,094	12.6	24,520,242	25.9
Investment real estate [1]	15,031,741	13.6	358,498	13.7	2,181,166	16.6	12,492,078	13.2
Tax-exempt bonds	9,834,976	8.9	74,641	2.9	465,358	3.5	9,294,977	9.8
Cash assets	9,730,272	8.8	185,979	7.1	830,327	6.3	8,713,967	9.2
Personal residence	8,645,453	7.8	275,158	10.5	1,200,263	9.1	7,170,033	7.6
Closely held stock	9,370,395	8.5	350,093	13.4	1,657,631	12.6	7,362,672	7.8
Retirement assets	9,479,563	8.6	184,839	7.1	1,874,692	14.3	7,420,033	7.8
Limited partnerships	3,549,399	3.2	35,101	1.3	344,421	2.6	3,169,877	3.4
Farms [2]	3,250,712	2.9	36,776	1.4	422,082	3.2	2,791,854	3.0
Federal bonds	2,496,716	2.3	21,466	0.8	130,814	1.0	2,344,437	2.5
Insurance [3]	3,427,675	3.1	563,102	21.5	1,345,331	10.2	1,519,242	1.6
Mortgages and notes	2,592,385	2.4	86,065	3.3	263,873	2.0	2,242,447	2.4
Other financial assets	2,216,580	2.0	38,189	1.5	149,640	1.1	2,028,751	2.1
Noncorporate business assets	1,552,148	1.4	74,256	2.8	288,989	2.2	1,188,904	1.3
Other assets	2,670,451	2.4	52,527	2.0	322,931	2.5	2,294,993	2.4

Asset type	All female decedents		Age of female decedents					
			Under 50		50 under 65		65 and older	
	Amount	Percent of total gross estate	Amount	Percent of total gross estate	Amount	Percent of total gross estate	Amount	Percent of total gross estate
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Total gross estate, tax purposes	75,621,227	100.0	851,868	100.0	4,942,792	100.0	69,826,567	100.0
Publicly traded stock	25,052,468	33.1	131,948	15.5	954,744	19.3	23,965,776	34.3
Investment real estate [1]	8,674,956	11.5	99,653	11.7	887,667	18.0	7,687,636	11.0
Tax-exempt bonds	8,499,725	11.2	38,501	4.5	313,436	6.3	8,147,787	11.7
Cash assets	7,768,824	10.3	81,007	9.5	420,661	8.5	7,267,156	10.4
Personal residence	7,211,688	9.5	132,392	15.5	763,016	15.4	6,316,279	9.0
Closely held stock	3,276,604	4.3	66,052	7.8	266,971	5.4	2,943,581	4.2
Retirement assets	3,118,053	4.1	82,171	9.6	509,707	10.3	2,526,175	3.6
Limited partnerships	1,303,574	1.7	24,419	2.9	81,872	1.7	1,197,283	1.7
Farms [2]	1,556,538	2.1	18,939	2.2	141,287	2.9	1,396,313	2.0
Federal bonds	2,072,834	2.7	14,404	1.7	72,195	1.5	1,986,235	2.8
Insurance [3]	514,661	0.7	70,625	8.3	141,281	2.9	302,755	0.4
Mortgages and notes	1,327,478	1.8	20,148	2.4	99,207	2.0	1,208,123	1.7
Other financial assets	1,680,942	2.2	14,989	1.8	100,431	2.0	1,565,523	2.2
Noncorporate business assets	1,443,429	1.9	26,108	3.1	61,726	1.2	1,355,595	1.9
Other assets	2,119,452	2.8	30,512	3.6	128,589	2.6	1,960,352	2.8

[1] Includes undeveloped land, real estate mutual funds, real estate partnerships, and other investment real estate.

[2] Includes farm land.

[3] Value is shown net of policy loans.

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

mon stock, real estate, and cash or cash equivalents, parents typically retain only a small general partnership interest and periodically give limited partnership interests to their children through lifetime gifts, using the annual exclusion available under the Federal gift tax or bequests.

Approximately 1,513 estate tax returns filed for decedents who died in 2004 included interests in family limited partnerships, whether operating family businesses or mere estate-planning devices. These returns represented 3.6 percent of all returns filed for 2004 decedents, a significant increase from the 1.7

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percent reported on estate tax returns filed for 2001 decedents.

As shown in Figure H, larger estates of 2004 decedents were more likely to include FLPs than their smaller counterparts. Only 2.0 percent of estates with total assets of at least \$1.5 million but less than \$2.0 million reported FLPs. A higher percentage of larger estates held FLPs, with 12.4 percent of estates with \$20.0 million or more in total assets reporting these partnerships. Estates with FLPs were almost equally divided in terms of taxability, with 53.4 percent reporting a tax liability and 46.6 reporting no liability.

Figure H

Family Limited Partnership (FLP) Holdings, by Tax Status and Size of Gross Estate, 2004 Estate Tax Decedents

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

Tax status and size of total gross estate, tax purposes	Number of returns with FLPs	As a percent of all returns	Amount held in FLPs
	(1)	(2)	(3)
All returns	1,513	3.6	2,954,261
\$1.5 million < \$2.0 million	292	2.0	177,790
\$2.0 million < \$3.5 million	588	3.7	518,558
\$3.5 million < \$5.0 million	162	3.4	149,716
\$5.0 million < \$10.0 million	253	5.8	525,789
\$10.0 million < \$20.0 million	120	8.2	437,765
\$20.0 million or more	99	12.4	1,144,643
All taxable returns	808	4.2	2,166,882
\$1.5 million < \$2.0 million	97	1.8	64,686
\$2.0 million < \$3.5 million	311	4.0	328,288
\$3.5 million < \$5.0 million	107	4.4	126,744
\$5.0 million < \$10.0 million	138	5.8	370,400
\$10.0 million < \$20.0 million	79	9.2	325,802
\$20.0 million or more	76	14.9	950,963
All nontaxable returns	705	3.1	787,379
\$1.5 million < \$2.0 million	195	2.1	113,104
\$2.0 million < \$3.5 million	276	3.3	190,270
\$3.5 million < \$5.0 million	55	2.4	22,972
\$5.0 million < \$10.0 million	115	5.7	155,389
\$10.0 million < \$20.0 million	41	6.8	111,963
\$20.0 million or more	23	7.9	193,681

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

Figure I presents FLP data for 2004 decedents by marital status. Estates of married and widowed decedents reported the highest percentage of holding family limited partnerships, with 3.8 percent of married decedents holding FLP assets compared to a nearly identical 3.9 percent of widowed decedents. This is unsurprising given that married and widowed decedents are more likely than other decedents to

have children as heirs. The estates of widowed decedents that reported FLPs had the highest average FLP value, more than \$2.4 million per estate. Only 0.8 percent of the estates of single decedents reported FLP assets, and the average value of FLPs held by these decedents was \$632,000, less than for any other marital status group.

As shown in Figure J, holdings of family limited partnerships also varied by age of the decedent. About 3.0 percent of the estates of decedents under age 70 reported family limited partnerships. A higher percentage of decedents ages 70 and older held FLPs, with about 3.7 percent of these decedents' estates reporting FLP assets.

Estates of decedents age 90 and older who held family limited partnership interests reported the largest average FLP holdings, almost \$2.6 million per estate. In contrast, the estates of decedents under age 60 who held FLP assets reported average FLP holdings of less than \$1.0 million. This is expected, given that these youngest decedents were probably still accumulating wealth at the time of their deaths.

Estate tax returns filed for 2004 decedents reported nearly \$3.0 billion in assets held in FLPs. As shown in Figure K, the asset composition of FLPs was very similar to the composition of estates' overall asset portfolio, with stock and real estate accounting for most of the value. Stock, including shares of publicly traded and closely held corporations, represented 38.2 percent of the value of all FLPs, while real estate, including personal residences, undeveloped land, real estate mutual funds and partnerships, and other investment real estate, made up 22.1 percent of the total. Bonds, including bond-based mutual funds, accounted for 11.7 percent of the value of FLPs, while limited partnership interests made up a similar 11.6 percent of the total.

Figure K also shows that the asset composition of FLPs varied by size of estate in a pattern similar to the composition of estates' overall asset portfolio. Most significantly, stocks and bonds made up a larger share of FLPs as estate size increased, while real estate accounted for a smaller share.

Valuation Discounts

Valuation discounts are frequently claimed on assets held as part of closely held corporations, limited liability companies, general partnerships, and limited partnerships. An estimated 5,909 estate tax returns filed for 2004 decedents included a valua-

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Figure I

Family Limited Partnership (FLP) Holdings, by Marital Status, 2004 Estate Tax Decedents

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

Marital status	All decedents	Decedents with family limited partnership holdings			Percent of all decedents with family limited partnership holdings
	Number	Number	Amount	Average FLP value	
	(1)	(2)	(3)	(4)	(5)
Total	42,239	1,513	2,954,261	1,953	3.6
Married	19,580	750	1,190,310	1,587	3.8
Widow or widowed	16,992	657	1,597,944	2,432	3.9
Single	3,005	25	15,788	632	0.8
Other [1]	2,662	82	150,219	1,832	3.1

[1] Other category includes divorced, legally separated, and those for whom marital status was not reported.

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

Figure J

Family Limited Partnership (FLP) Holdings, by Age at Death, 2004 Estate Tax Decedents

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

Age	All decedents	Decedents with family limited partnership holdings			Percent of all decedents with family limited partnership holdings
	Number	Number	Amount	Average FLP value	
	(1)	(2)	(3)	(4)	(5)
Total	42,239	1,513	2,954,261	1,953	3.6
Under 50	1,064	33	26,823	813	3.1
50 under 60	2,181	63	44,527	707	2.9
60 under 70	5,087	149	177,532	1,191	2.9
70 under 80	9,730	392	649,344	1,656	4.0
80 under 90	15,671	595	1,337,649	2,248	3.8
90 and older	8,506	280	718,386	2,566	3.3

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

Figure K

Composition of Family Limited Partnerships, by Size of Gross Estate, 2004 Estate Tax Decedents

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

Asset type	All		Size of total gross estate, tax purposes					
			Small (less than \$3.5 million)		Medium (\$3.5 million < \$5 million)		Large (\$5 million or more)	
	Amount	Percent of total	Amount	Percent of total	Amount	Percent of total	Amount	Percent of total
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Total	2,954,261	100.0	696,349	100.0	149,716	100.0	2,108,197	100.0
Stock [1]	1,128,515	38.2	135,703	19.5	58,323	39.0	934,489	44.3
Real estate [2]	653,658	22.1	249,095	35.8	38,654	25.8	365,909	17.4
Bonds	344,434	11.7	66,054	9.5	15,079	10.1	263,301	12.5
Limited partnerships	343,652	11.6	111,586	16.0	19,081	12.7	212,985	10.1
Farms [3]	169,020	5.7	58,690	8.4	5,548	3.7	104,783	5.0
Cash assets	126,428	4.3	35,975	5.2	4,009	2.7	86,444	4.1
Other assets	188,554	6.4	39,246	5.6	9,022	6.0	140,286	6.7

[1] Includes closely held and publicly traded stock.

[2] Includes personal residences, undeveloped land, real estate mutual funds, real estate partnerships, and other investment real estate.

[3] Includes farm land.

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

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tion discount, 14.0 percent of all returns. As shown in Figure L, the total amount of valuation discounts reported by these estates was approximately \$6.5 billion. Most of the value of these discounts, 54.3 percent, was taken on stock, including closely held and publicly traded shares. Discounts on real estate accounted for the second largest portion of the total, 19.7 percent, followed by limited partnerships, farms, and other noncorporate business assets.

Figure L

Composition of Valuation Discounts, by Asset Type, 2004 Estate Tax Decedents

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

Asset type	Valuation discounts	
	Amount	Percent of total
Total	6,476,962	100.0
Stock [1]	3,519,070	54.3
Real estate [2]	1,278,342	19.7
Limited partnerships	869,776	13.4
Farms [3]	291,083	4.5
Noncorporate business assets	208,472	3.2
Other assets	310,219	4.8

[1] Includes closely held and publicly traded stock.

[2] Includes personal residences, undeveloped land, real estate mutual funds, real estate partnerships, and other investment real estate.

[3] Includes farm land.

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

Another way to measure the effect of valuation discounts is by looking at the reduction in value of specific asset types for all returns. Overall, discounts reduced the total gross estate by 3.4 percent, but, as shown in Figure M, this percent varied significantly by asset type. The largest reduction in value due to discounts, 15.2 percent, was reported for limited partnerships, including family limited partnership assets that could not be assigned a specific asset code. The second largest reduction in value, 6.5 percent, was reported for other noncorporate business assets, followed by farms and stock, 5.7 percent and 5.2 percent, respectively.

Valuation discounts taken on assets held in family limited partnerships (FLPs) have long been a topic of interest because of the increasing use of FLPs as estate-planning devices. Claiming discounts on assets held in FLPs can minimize both the value of these assets and the reported Federal estate or gift tax liability. For 2004 decedents, \$3.5 billion in dis-

counts were reported for assets held in FLPs, which represented 54.2 percent of the value of all discounts. The average discount rate reported for assets held in FLPs was 32.0 percent.

As shown in Figure N, approximately 60 percent of all family limited partnerships held by 2004 decedents reported valuation discounts. This percentage, however, varied considerably by the marital status of the decedent. About 76.1 percent of the estates of widowed decedents who held FLP assets reported valuation discounts on these assets, more frequently than for any other marital status group. In contrast, only about 48.0 percent of the estates of single decedents who held FLP assets reported discounts on these assets. Approximately 55.7 percent of the estates of married decedents who held FLP assets reported discounts on these assets.

Figure O shows that estates of older decedents who held family limited partnership interests were more likely to report a valuation discount on these assets than the estates of their younger counterparts. Less than half of estates of decedents under age 60 reported these discounts, but this percentage increased steadily beyond age 60. More than 74 percent of estates of decedents age 90 and older reported these discounts. As expected, Figures N and O suggest that older, widowed decedents were further along in the estate planning and asset divestiture processes than their younger counterparts, who were more likely to be married or single.

Charitable Bequests

Deductions allowed in the calculation of taxable estate, defined as gross estate less deductions, include funeral expenses, executors' commissions, attorneys' fees, other administrative expenses and losses, debts and mortgages, medical debts, bequests to surviving spouses, and charitable contributions. According to IRC section 2055, "the value of the taxable estate shall be determined by deducting from the value of the gross estate the amount of all bequests, legacies, devises, or transfers" to qualifying charitable institutions, including organizations that conduct religious, charitable, scientific, literary, and educational activities, among others.

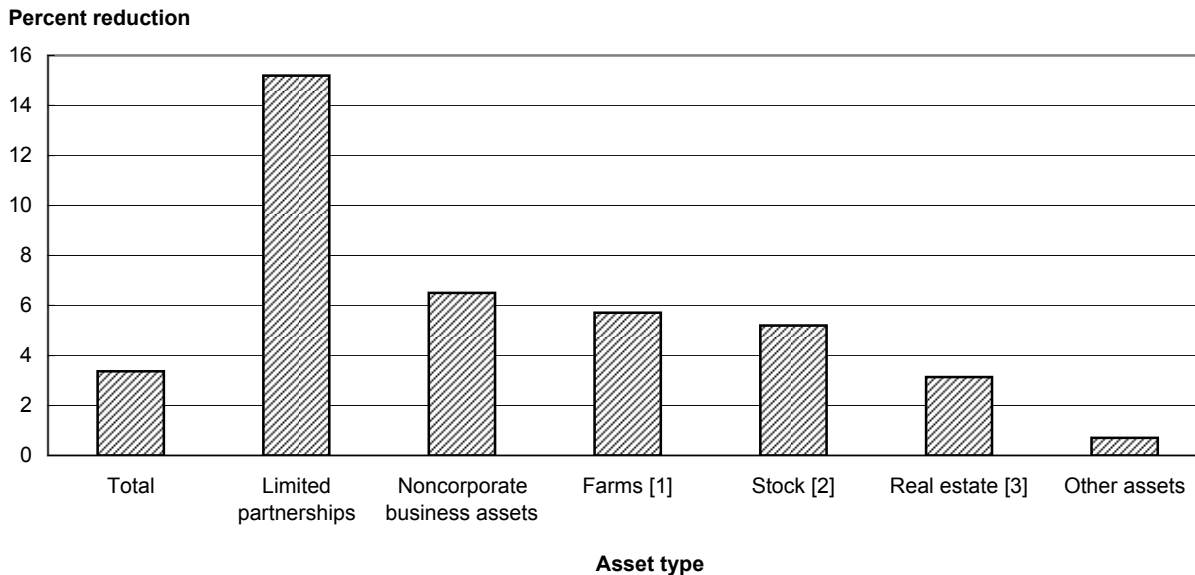
For Year of Death 2004, about 20.6 percent of all estate tax decedents left bequests to qualifying charitable organizations (Figure P). Gross charitable bequests exceeded \$17.8 billion, which was equiva-

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Figure M

Reduction in Value of Assets Due to Discounts, 2004 Estate Tax Decedents



[1] Includes farmland.

[2] Includes closely held and publicly traded stock.

[3] Includes personal residences, undeveloped land, real estate mutual funds, real estate partnerships, and other investment real estate.

lent to 9.6 percent of all decedents' total gross estate. Larger estates were more likely to report a charitable bequest than their smaller counterparts. More than 16 percent of estates with gross estates of less than \$2.0 million reported a charitable bequest. This percentage increased steadily with size of gross estate, and 44.2 percent of estates with \$20.0 million or more reported a charitable bequest.

Not surprisingly, larger estates also gave away a larger portion of their gross estates than their smaller counterparts, on average. Bequests from estates with less than \$2.0 million in gross estate averaged only 3.8 percent of total gross estate, but this percentage increased steadily with estate size. Estates with \$20 million or more in gross estate left an average of 20.1 percent of gross estate to qualifying charities. These very large estates made up less than 2.0 percent of the 2004 estate tax population but reported more than \$10 billion in gross bequests, which accounted for 56.2 percent of aggregate bequests.

Charitable organizations can be divided into categories that describe their general activities as set forth in the National Taxonomy of Exempt Enti-

ties (NTEE) Classification System developed by the National Center for Charitable Statistics. As shown in Figure Q, decedent donors in the 2004 estate tax population left \$10.3 billion in cash and other assets to organizations that promote philanthropy and giving, which represented 57.7 percent of total bequests. Educational organizations and organizations that support educational entities received \$2.6 billion in bequests from decedents who died in 2004. These bequests represented about 14.6 percent of the total. Religious and spiritual development charities received \$1.1 billion in bequests, or 6.1 percent of the total. This category does not include educational institutions, hospitals, etc., operated by religious groups, as institutions are allocated to charitable contribution categories by activity rather than ownership.

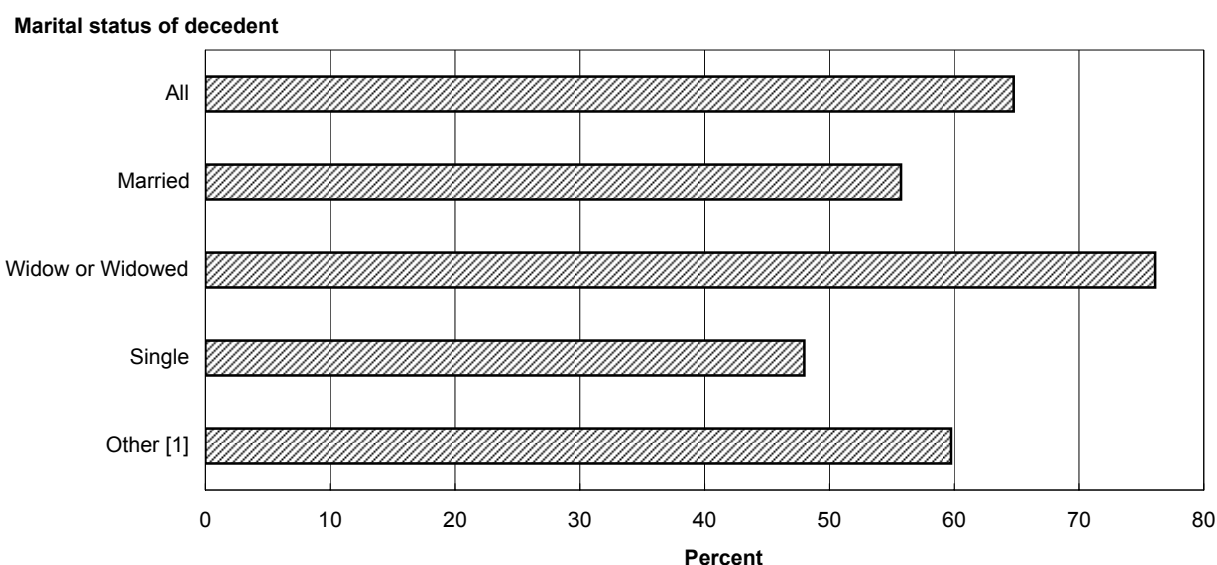
Figure Q also shows that the charitable giving of decedents varies significantly by size of estate. Small estates left a much smaller share of their charitable bequests to philanthropic organizations, 13.6 percent, than the average estate. In contrast, they left significantly larger shares to educational and religious organizations, 28.7 percent and 18.5 percent,

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Figure N

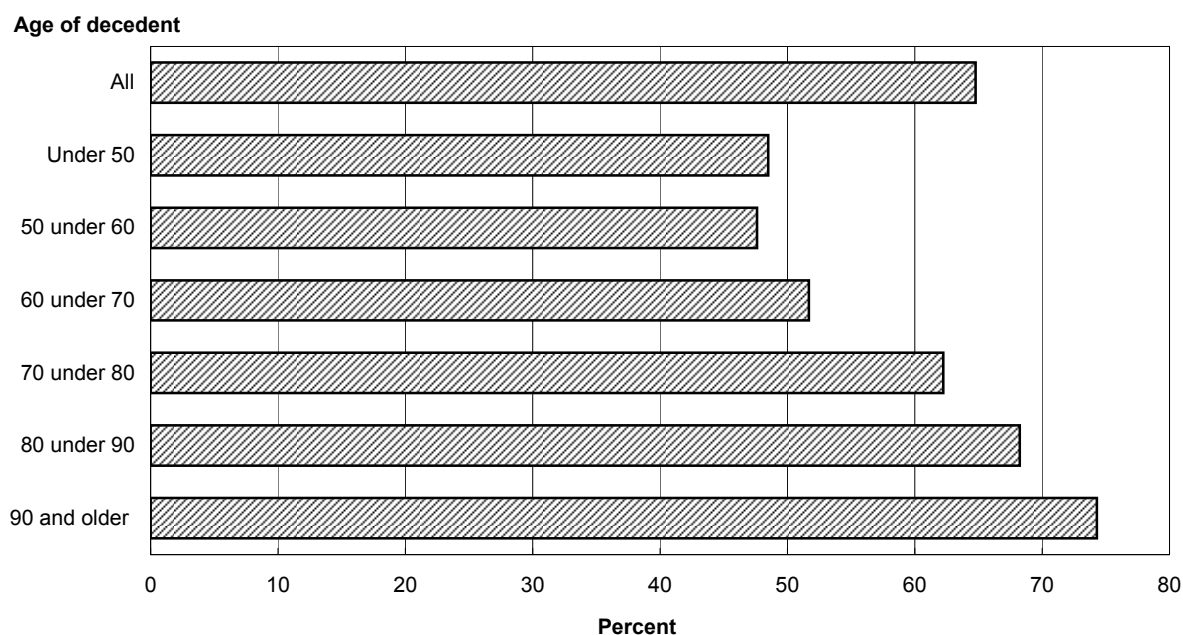
Percent of Family Limited Partnerships with Valuation Discounts, by Marital Status of Decedent, 2004 Estate Tax Decedents



[1] Other category includes divorced, legally separated, and those for whom marital status was not reported.

Figure O

Percent of Family Limited Partnerships with Valuation Discounts, by Age of Decedent at Death, 2004 Estate Tax Decedents



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Figure P

Total Gross Estate and Charitable Bequests, by Size of Gross Estate, 2004 Estate Tax Decedents

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

Size of gross estate	Number of all estates	Estates with charitable bequests	Percent with charitable bequests	Total gross estate, tax purposes, all decedents	Amount of charitable bequests [1]	Bequests as a percent of gross estate
	(1)	(2)	(3)	(4)	(5)	(6)
Total	42,239	8,722	20.6	185,921,379	17,827,014	9.6
\$1.5 million < \$2.0 million	14,818	2,450	16.5	25,487,122	969,820	3.8
\$2.0 million < \$3.5 million	16,022	3,216	20.1	41,255,953	1,885,376	4.6
\$3.5 million < \$5.0 million	4,756	1,069	22.5	19,668,543	1,167,311	5.9
\$5.0 million < \$10.0 million	4,384	1,160	26.5	29,661,196	2,044,272	6.9
\$10.0 million < \$20.0 million	1,458	474	32.5	19,962,325	1,735,225	8.7
\$20.0 million or more	801	354	44.2	49,886,242	10,025,010	20.1

[1] Charitable bequests presented in this figure are gross charitable bequests. Unlike the charitable deduction value reported in Table 2 of this article, gross charitable bequests have not been reduced by Federal estate, generation-skipping, and State death taxes. Since the charitable deduction is not allowed for these taxes that are paid out of property designated for charity, gross charitable bequests are larger than the charitable deduction.

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

Figure Q

Top Charitable Bequests to Recipient Organizations, by Size of Gross Estate, 2004 Estate Tax Decedents

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

Type of organization [1]	All		Size of gross estate, tax purposes					
			Small (less than \$3.5 million)		Medium (\$3.5 million < \$5 million)		Large (\$5 million or more)	
	Bequest amount [2]	Percent of total bequests	Bequest amount [2]	Percent of total bequests	Bequest amount [2]	Percent of total bequests	Bequest amount [2]	Percent of total bequests
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Total	17,827,014	100.0	2,855,195	100.0	1,167,311	100.0	13,804,507	100.0
Philanthropy and volunteerism (T)	10,289,345	57.7	387,501	13.6	212,428	18.2	9,689,416	70.2
Educational institutes (B)	2,605,507	14.6	820,175	28.7	329,068	28.2	1,456,264	10.5
Religion, spiritual development (X)	1,085,648	6.1	529,054	18.5	113,111	9.7	443,482	3.2
Human service (P)	658,151	3.7	222,896	7.8	123,003	10.5	312,252	2.3
Health, general and rehabilitative (E)	603,890	3.4	228,055	8.0	88,683	7.6	287,151	2.1
Arts, culture, humanities (A)	501,923	2.8	57,934	2.0	60,288	5.2	383,700	2.8
Disease, disorder, and medical (G)	299,588	1.7	153,531	5.4	49,401	4.2	96,656	0.7
Animal-related activities (D)	288,343	1.6	77,311	2.7	61,981	5.3	149,051	1.1
Other/unknown	1,494,619	8.4	378,738	13.3	129,348	11.1	986,535	7.1

[1] National Taxonomy of Exempt Entities (NTEE) code is given in parentheses. In all, there are 26 entity types in the NTEE coding system. Here, the "other/unknown" category includes all entity types not specifically listed and entity types unknown. In Table 4 of this article, entity types are combined into 10 broad categories.

[2] Charitable bequests presented in this figure are gross charitable bequests. Unlike the charitable deduction value reported in Table 2 of this article, gross charitable bequests have not been reduced by Federal estate, generation-skipping, and State death taxes. Since the charitable deduction is not allowed for these taxes that are paid out of property designated for charity, gross charitable bequests are larger than the charitable deduction.

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

respectively. Medium estates reported a bequest distribution similar to their smaller counterparts, although they left a smaller share to religious organizations and larger shares to organizations promoting human services and arts, culture, and humanities, and

those that promote animal welfare. Large estates left most of their bequests, 70.2 percent, to philanthropic organizations. This is primarily attributable to large bequests to private foundations from estates of the wealthiest decedents.

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Summary

In 2004, an estimated 42,239 individuals died with gross estates above the estate tax exemption amount of \$1.5 million. Male decedents, who made up 56.2 percent of the total, reported an average total gross estate of \$4.6 million, while female decedents reported a slightly smaller average, \$4.1 million. The majority of male decedents, 62.8 percent, were married, while a similar 61.4 percent of female decedents were widowed.

Estate tax returns filed for 2004 decedents reported nearly \$186 billion in total gross estate. The largest share of this gross estate was held in publicly traded stock, which accounted for 27.7 percent of the total. However, portfolio distribution varied significantly for decedents in different gross estate size classes. Decedents from small estates (less than \$3.5 million in gross estate) held larger shares of their portfolios in real estate, cash, and retirement assets, while decedents from medium estates (\$3.5 million but less than \$5 million in gross estate) and large estates (\$5 million or more in gross estate) held larger shares in stock and limited partnerships.

Bequests to charity from 2004 decedents totaled nearly \$18 billion, of which the majority, 57.7 percent, was given to organizations promoting philanthropy and volunteerism. Charitable bequest distribution patterns, however, varied by gross estate size class. While decedents from small estates gave nearly half, 47.2 percent, of their total charitable bequests to educational or religious organizations, decedents from large estates gave 70.2 percent of their charitable bequests to philanthropic organizations. Altogether, these large estates accounted for \$13.8 billion in charitable bequests, more than 77 percent of the total.

Data Sources and Limitations

Analysts in the Special Projects Section of SOI's Special Studies Branch, with SOI staff in the Cincinnati Submission Processing Center, conduct the Estate Tax Study, which extracts demographic, financial, and bequest data from Form 706, the Federal estate tax return. The Estate Tax Study is conducted on an annual basis, which allows annual production of filing year data on estate taxation. By focusing on a single year of death for a period of 3 years, the study also allows production of periodic year-of-death estimates.

Year-of-death estimates are advantageous in that the included estates would have been subject to the same tax law and similar economic conditions. A single year of death is sampled for 3 calendar years, and 99 percent of all returns for decedents who die in a given year are filed by the end of the second calendar year following the year of death. The Estate Tax Study for the period 2004-2006 concentrates on Year of Death 2004, the most recent year-of-death estimates available. Study Years 2007-2009 will concentrate on Year of Death 2007.

For each study year, 2004-2006, a sample was selected from returns filed. Samples were limited to returns filed for decedents who died after 1981. The sample for Filing Year 2004 included 11,674 returns out of a total population of 65,039. In 2005, the year in which most returns for 2004 decedents were filed, 12,910 returns were sampled out of a total of 45,070. There were 13,372 returns out of 49,050 sampled during Filing Year 2006. Of the 37,956 returns sampled during 2004-2006, there were 11,817 returns filed for 2004 decedents.

Estate tax returns were sampled while the returns were being processed for administrative purposes, but before any audit examination. Returns were selected on a flow basis, using a stratified random probability sampling method, whereby the sample rates were preset based on the desired sample size and an estimate of the population. The design had three stratification variables: year of death, age at death, and size of total gross estate plus adjusted taxable gifts.

For Filing Years 2004-2006, the year-of-death variable was separated into two categories: 2004 year of death and non-2004 year of death. Age was disaggregated into four categories: under 40, 40 under 50, 50 under 65, and 65 and older (including age unknown). Total gross estate plus adjusted taxable gifts was limited to six categories: under \$1.5 million, \$1.5 million under \$2.0 million, \$2.0 million under \$3.0 million, \$3.0 million under \$5.0 million, \$5.0 million under \$10.0 million, and \$10.0 million or more. Sampling rates ranged from 1 percent to 100 percent. Returns for more than half of the strata were selected at the 100-percent rate.

Because almost 99 percent of all returns for decedents who die in a given year are filed by the end of the second calendar year following the year of death and because the decedent's age at death and

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the length of time between the decedent's date of death and the filing of an estate tax return are related, it was possible to predict the percentage of unfilled returns within age strata. The sample weights were adjusted accordingly, in order to account for returns for 2004 decedents not filed by the end of Filing Year 2006.

Explanation of Selected Terms

Brief definitions of some of the terms used in the tables are provided below:

Adjusted taxable estate—This is the sum of taxable estate and adjusted taxable gifts.

Adjusted taxable gifts—Certain gifts made during the life of an individual who died before 1982 were automatically included in the gross estate. However, for the estate of an individual who died after 1981, these gifts were not generally included in the gross estate. Instead, they were added to the taxable estate, creating the "adjusted taxable estate" for the purposes of determining the "estate tax before credits."

Bequests to surviving spouse—These are the values of property interests passing from the decedent to the surviving spouse, and are taken as a deduction from the total gross estate.

Charitable deduction—This is the deduction allowable for decedent's contributions to qualifying charitable organizations.

Estate tax before credits—This is the tax obtained by applying the graduated estate tax rates to the adjusted taxable estate reduced by the amount of Federal gift taxes previously paid.

Exclusion or exemption amount—The value of property transfers that individuals may give during life or at death.

Federal gift taxes previously paid—A credit was allowed against the estate tax for the Federal gift tax paid on a gift made by a decedent before 1977. No credit, apart from the unified credit, is allowed for any gift tax paid on gifts made after 1976.

Filing threshold—Same as exclusion or exemption amount.

Net estate tax—This is the tax liability of the estate after subtraction of credits for State death taxes, foreign death taxes, credit for tax on prior transfers, and Federal gift taxes previously paid. In addition, a unified credit, graduated according to the year of death and a "credit" for gift taxes paid on post-1976 gifts, is allowed (see also "unified credit").

Net worth—Net worth is equal to total gross estate less mortgages and other debts calculated at a decedent's date of death.

Nontaxable return—A nontaxable return is one with no estate tax liability after credits.

Other tax credits—These are the sum of all tax credits for foreign death taxes, Federal gift taxes, and taxes on prior transfers taken as a deduction against the estate tax before credits.

Tax on prior transfers—A tax credit is allowed for Federal estate tax paid on property received by the decedent or the estate from a transferor who died within 10 years before, or 2 years after, the decedent. The credit is intended to lessen the burden of double taxation between successive estates whose owners died within a short time. Depending on the time that has elapsed between the deaths, a credit is allowed for all or part of the Federal estate tax paid by the transferor's estate with respect to the transfer.

Taxable estate—Taxable estate is the base to which the graduated Federal estate tax rates are applied in computing the estate tax before credits. Taxable estate is equal to the value of the total gross estate less deductions for the following: funeral and administrative expenses; casualty and theft losses; debts, mortgages, losses, and other claims against the estate, including pledges to charitable organizations; bequests to the surviving spouse; and the employee stock ownership plan (ESOP) deduction (included in the statistics for "other expenses and losses").

Taxable return—A taxable return is one with estate tax liability after credits.

Total gross estate—An estate tax return is required in the case of every decedent whose gross estate, at the date of death, exceeded the legal filing requirement in effect for the year of death. For estate tax purposes, the gross estate includes all property or interest in property before reduction by debts (except policy loans against insurance) and mortgages, or administrative expenses. Included in the gross estate are such items as real estate, tangible and intangible personal property, certain lifetime gifts made by the decedent, property in which the decedent had a general power of appointment, the decedent's interest in annuities receivable by the surviving beneficiary, the decedent's share in community property, life insurance proceeds (even though payable to beneficiaries other than the estate), dower or curtesy of the surviving spouse (in-

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herited property), and, with certain exceptions, joint estates with right of survivorship and tenancies by the entirety. In this article, total gross estate refers to the value of assets at the date of the decedent's death.

Unified credit—The unified credit is applied as a dollar-for-dollar reduction in estate and/or gift

taxes. The unified credit represents the amount of tax on that part of gross estate that is below the filing requirement. The credit must be used to offset gift taxes on lifetime transfers made after 1976. However, to the extent it is so used, the amount of credit available at death is reduced.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1a. Estate Tax Returns Filed in 2004 [1], by Tax Status and Size of Gross Estate

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

Tax status and size of gross estate	Gross estate for tax purposes [2]		Type of property					
			Personal residence		Other real estate [3]		Real estate partnerships	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All returns	65,039	194,450,290	42,037	17,422,486	38,761	24,386,228	3,039	3,038,729
Under \$1.0 million	2,321	1,815,190	977	254,854	1,131	272,127	**	**
\$1.0 million < \$1.5 million	25,141	30,635,926	15,816	4,767,383	13,976	4,655,442	** 448	** 71,409
\$1.5 million < \$2.0 million	13,586	23,367,243	8,890	2,905,422	7,827	3,548,051	490	197,810
\$2.0 million < \$3.5 million	13,936	35,748,727	9,390	3,909,215	8,770	5,332,268	868	347,265
\$3.5 million < \$5.0 million	4,198	17,378,183	2,855	1,543,225	2,839	2,446,048	381	216,315
\$5.0 million < \$10.0 million	3,806	25,957,237	2,601	1,929,373	2,652	3,214,372	451	425,344
\$10.0 million < \$20.0 million	1,315	17,906,950	946	1,066,887	988	2,014,336	226	405,231
\$20.0 million or more	736	41,640,833	561	1,046,127	578	2,903,583	175	1,375,356
All taxable returns	31,329	108,490,864	18,569	8,634,074	17,353	11,557,680	1,275	1,478,242
Under \$1.0 million	1,053	810,545	321	83,255	374	74,637	**	**
\$1.0 million < \$1.5 million	10,269	12,953,470	5,666	1,823,314	5,227	1,641,406	** 189	** 23,856
\$1.5 million < \$2.0 million	7,057	12,194,643	4,247	1,539,251	3,605	1,567,570	169	53,950
\$2.0 million < \$3.5 million	7,290	18,660,173	4,630	2,001,861	4,358	2,519,699	342	133,056
\$3.5 million < \$5.0 million	2,165	8,926,896	1,350	735,112	1,381	1,110,955	160	60,415
\$5.0 million < \$10.0 million	2,166	14,910,242	1,402	1,096,488	1,430	1,526,179	192	151,441
\$10.0 million < \$20.0 million	808	11,002,779	564	614,085	583	1,100,716	114	155,616
\$20.0 million or more	520	29,032,119	390	740,709	396	2,016,518	109	899,908
All nontaxable returns	33,710	85,959,425	23,467	8,788,412	21,408	12,828,548	1,765	1,560,487
Under \$1.0 million	1,267	1,004,646	656	171,599	757	197,490	**	**
\$1.0 million < \$1.5 million	14,872	17,682,456	10,150	2,944,070	8,749	3,014,036	** 259	** 47,554
\$1.5 million < \$2.0 million	6,529	11,172,600	4,643	1,366,172	4,222	1,980,482	321	143,859
\$2.0 million < \$3.5 million	6,646	17,088,555	4,761	1,907,354	4,413	2,812,569	526	214,209
\$3.5 million < \$5.0 million	2,034	8,451,287	1,505	808,113	1,458	1,335,093	222	155,900
\$5.0 million < \$10.0 million	1,640	11,046,996	1,199	832,886	1,222	1,688,193	258	273,903
\$10.0 million < \$20.0 million	507	6,904,171	382	452,802	404	913,620	113	249,614
\$20.0 million or more	216	12,608,714	171	305,418	182	887,065	66	475,448

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1a. Estate Tax Returns Filed in 2004 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Closely held stock		Publicly traded stock		State and local bonds		Federal savings bonds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All returns	8,936	11,745,389	51,713	47,554,809	33,417	21,084,097	8,734	741,938
Under \$1.0 million	264	48,443	1,515	354,009	932	135,795	320	14,312
\$1.0 million < \$1.5 million	1,951	499,749	18,942	5,310,540	10,920	2,279,277	3,788	276,488
\$1.5 million < \$2.0 million	1,637	545,073	10,680	4,511,842	6,904	2,280,886	1,967	182,992
\$2.0 million < \$3.5 million	2,276	1,087,255	11,659	7,728,962	7,896	3,897,313	1,747	190,424
\$3.5 million < \$5.0 million	902	707,700	3,670	4,383,884	2,674	2,100,049	419	40,208
\$5.0 million < \$10.0 million	1,040	1,534,229	3,368	7,183,389	2,619	3,547,265	332	24,813
\$10.0 million < \$20.0 million	489	1,463,240	1,193	5,174,032	938	2,384,666	117	8,094
\$20.0 million or more	377	5,859,700	686	12,908,152	534	4,458,845	44	4,607
All taxable returns	3,487	5,818,659	25,885	30,630,971	18,094	13,780,439	4,458	457,728
Under \$1.0 million	* 135	* 16,644	791	199,977	499	58,831	* 102	* 5,006
\$1.0 million < \$1.5 million	600	125,152	8,175	2,708,468	4,986	1,135,991	1,522	127,581
\$1.5 million < \$2.0 million	566	153,164	5,588	2,677,755	3,894	1,393,598	1,206	153,385
\$2.0 million < \$3.5 million	894	401,573	6,178	4,666,376	4,524	2,413,744	1,067	125,436
\$3.5 million < \$5.0 million	310	204,175	1,934	2,553,105	1,533	1,293,246	243	24,268
\$5.0 million < \$10.0 million	481	594,448	1,978	4,794,525	1,628	2,327,116	204	14,561
\$10.0 million < \$20.0 million	251	663,063	747	3,712,187	618	1,604,580	78	5,651
\$20.0 million or more	249	3,660,440	494	9,318,577	411	3,553,333	36	1,840
All nontaxable returns	5,449	5,926,730	25,828	16,923,838	15,323	7,303,658	4,276	284,210
Under \$1.0 million	130	31,799	724	154,031	433	76,964	217	9,306
\$1.0 million < \$1.5 million	1,351	374,597	10,767	2,602,071	5,933	1,143,286	2,267	148,907
\$1.5 million < \$2.0 million	1,071	391,909	5,092	1,834,087	3,010	887,288	761	29,606
\$2.0 million < \$3.5 million	1,381	685,683	5,481	3,062,586	3,372	1,483,569	681	64,989
\$3.5 million < \$5.0 million	592	503,525	1,736	1,830,779	1,142	806,803	175	15,940
\$5.0 million < \$10.0 million	559	939,781	1,390	2,388,864	991	1,220,149	128	10,252
\$10.0 million < \$20.0 million	237	800,177	446	1,461,845	320	780,086	38	2,442
\$20.0 million or more	128	2,199,260	192	3,589,575	123	905,512	8	2,767

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1a. Estate Tax Returns Filed in 2004 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Other Federal bonds		Corporate and foreign bonds		Bond funds		Unclassifiable mutual funds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
All returns	15,988	4,996,190	18,456	2,804,557	4,872	478,335	11,005	1,100,854
Under \$1.0 million	323	28,962	337	27,851	**	**	305	12,278
\$1.0 million < \$1.5 million	5,479	631,169	6,589	542,407	** 1,963	** 145,064	4,055	359,592
\$1.5 million < \$2.0 million	3,543	544,654	3,935	419,501	1,064	80,521	2,345	162,097
\$2.0 million < \$3.5 million	3,712	778,694	4,260	494,761	1,034	77,304	2,581	256,453
\$3.5 million < \$5.0 million	1,206	373,788	1,360	236,247	395	58,022	751	84,163
\$5.0 million < \$10.0 million	1,066	545,067	1,292	322,538	289	45,148	654	88,852
\$10.0 million < \$20.0 million	406	432,686	428	188,605	87	29,493	206	81,024
\$20.0 million or more	253	1,661,171	253	572,647	39	42,784	108	56,395
All taxable returns	9,175	3,289,090	9,866	1,733,322	2,803	301,461	5,453	595,954
Under \$1.0 million	134	8,559	216	18,223	**	**	172	5,698
\$1.0 million < \$1.5 million	2,823	352,030	3,014	269,463	** 1,047	** 73,192	1,848	177,789
\$1.5 million < \$2.0 million	2,250	367,620	2,197	265,236	623	50,892	1,144	83,473
\$2.0 million < \$3.5 million	2,148	486,758	2,386	284,566	607	54,776	1,341	139,173
\$3.5 million < \$5.0 million	705	220,715	782	160,542	252	38,203	380	44,145
\$5.0 million < \$10.0 million	668	407,531	805	236,174	181	28,797	377	63,609
\$10.0 million < \$20.0 million	262	289,111	278	133,380	66	22,807	113	40,131
\$20.0 million or more	184	1,156,765	188	365,739	26	32,795	77	41,937
All nontaxable returns	6,813	1,707,100	8,590	1,071,235	2,069	176,874	5,552	504,900
Under \$1.0 million	189	20,403	121	9,628	**	**	* 133	* 6,580
\$1.0 million < \$1.5 million	2,656	279,139	3,576	272,945	** 916	** 71,871	2,207	181,803
\$1.5 million < \$2.0 million	1,293	177,033	1,738	154,265	441	29,630	1,201	78,623
\$2.0 million < \$3.5 million	1,564	291,935	1,875	210,195	426	22,528	1,240	117,280
\$3.5 million < \$5.0 million	501	153,073	578	75,705	143	19,819	371	40,019
\$5.0 million < \$10.0 million	398	137,536	487	86,364	108	16,351	277	25,243
\$10.0 million < \$20.0 million	144	143,575	150	55,225	21	6,686	94	40,893
\$20.0 million or more	69	504,406	65	206,908	13	9,989	30	14,458

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1a. Estate Tax Returns Filed in 2004 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Cash		Cash management accounts		Insurance, face value		Insurance, policy loans	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
All returns	62,708	13,951,152	45,848	8,048,537	33,511	5,061,924	3,830	121,394
Under \$1.0 million	2,163	228,809	1,451	78,583	1,072	49,858	**	**
\$1.0 million < \$1.5 million	24,177	3,839,272	16,349	1,298,870	12,772	1,092,268	** 1,417	** 24,158
\$1.5 million < \$2.0 million	13,089	2,192,849	9,587	1,057,142	7,148	920,717	737	22,139
\$2.0 million < \$3.5 million	13,473	2,838,467	10,318	1,456,959	7,523	1,398,830	885	33,166
\$3.5 million < \$5.0 million	4,087	1,154,562	3,274	735,808	2,123	499,741	328	11,481
\$5.0 million < \$10.0 million	3,717	1,295,722	3,096	1,132,570	1,878	672,647	312	18,178
\$10.0 million < \$20.0 million	1,282	821,230	1,128	783,317	643	245,158	98	4,193
\$20.0 million or more	720	1,580,242	645	1,505,289	353	182,705	54	8,079
All taxable returns	30,702	8,703,932	23,332	4,968,659	13,814	1,432,551	1,421	39,816
Under \$1.0 million	993	152,213	688	47,795	354	12,909	**	**
\$1.0 million < \$1.5 million	10,124	2,002,066	7,333	629,807	4,559	211,514	** 418	** 4,275
\$1.5 million < \$2.0 million	6,894	1,402,847	5,090	601,464	3,145	282,062	315	6,928
\$2.0 million < \$3.5 million	7,108	1,746,786	5,555	881,689	3,404	386,153	349	12,931
\$3.5 million < \$5.0 million	2,123	751,436	1,704	421,273	889	140,929	107	3,981
\$5.0 million < \$10.0 million	2,147	822,449	1,798	762,722	875	207,634	153	8,255
\$10.0 million < \$20.0 million	800	561,922	701	535,076	359	103,438	45	1,366
\$20.0 million or more	514	1,264,212	464	1,088,833	229	87,912	34	2,080
All nontaxable returns	32,006	5,247,220	22,516	3,079,878	19,697	3,629,372	2,409	81,578
Under \$1.0 million	1,170	76,596	763	30,788	719	36,949	**	**
\$1.0 million < \$1.5 million	14,053	1,837,205	9,015	669,063	8,213	880,754	** 998	** 19,882
\$1.5 million < \$2.0 million	6,195	790,001	4,497	455,678	4,002	638,655	422	15,211
\$2.0 million < \$3.5 million	6,366	1,091,681	4,763	575,270	4,119	1,012,678	537	20,235
\$3.5 million < \$5.0 million	1,964	403,125	1,570	314,535	1,234	358,812	221	7,500
\$5.0 million < \$10.0 million	1,570	473,273	1,299	369,848	1,003	465,012	159	9,923
\$10.0 million < \$20.0 million	482	259,307	427	248,241	284	141,720	52	2,827
\$20.0 million or more	206	316,030	181	416,456	124	94,793	20	5,999

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1a. Estate Tax Returns Filed in 2004 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Farm assets [3]		Limited partnerships		Other noncorporate business assets		Mortgages and notes	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
All returns	4,258	1,029,893	8,445	4,475,211	6,310	2,533,506	13,644	4,347,403
Under \$1.0 million	**	**	* 129	* 9,270	166	16,546	497	81,384
\$1.0 million < \$1.5 million	** 1,829	** 172,932	2,327	195,583	1,525	146,339	3,799	490,192
\$1.5 million < \$2.0 million	822	148,379	1,506	225,483	1,199	151,505	2,647	381,178
\$2.0 million < \$3.5 million	882	226,460	1,876	301,607	1,443	307,796	3,245	640,711
\$3.5 million < \$5.0 million	271	92,375	874	278,243	610	214,147	1,219	348,466
\$5.0 million < \$10.0 million	266	147,459	986	600,942	737	339,190	1,270	631,594
\$10.0 million < \$20.0 million	119	106,930	431	601,328	355	275,731	582	579,062
\$20.0 million or more	68	135,358	317	2,262,755	275	1,082,251	385	1,194,815
All taxable returns	1,746	418,429	4,080	2,504,679	2,505	1,028,105	6,734	2,409,254
Under \$1.0 million	**	**	* 62	* 648	* 104	* 11,397	268	36,487
\$1.0 million < \$1.5 million	** 659	** 37,970	1,035	83,957	542	42,884	1,497	179,803
\$1.5 million < \$2.0 million	283	63,187	776	124,022	425	71,800	1,330	187,065
\$2.0 million < \$3.5 million	390	58,499	805	139,705	504	81,044	1,670	319,332
\$3.5 million < \$5.0 million	143	40,581	403	100,820	254	62,916	649	190,687
\$5.0 million < \$10.0 million	142	67,517	542	334,351	305	129,214	685	316,091
\$10.0 million < \$20.0 million	80	79,419	236	329,115	192	121,242	360	305,426
\$20.0 million or more	49	71,257	219	1,392,062	179	507,608	276	874,363
All nontaxable returns	2,511	611,464	4,365	1,970,532	3,804	1,505,401	6,910	1,938,149
Under \$1.0 million	**	**	* 67	* 8,622	* 62	* 5,149	229	44,897
\$1.0 million < \$1.5 million	** 1,171	** 134,962	1,292	111,626	982	103,456	2,301	310,390
\$1.5 million < \$2.0 million	539	85,192	730	101,461	774	79,705	1,317	194,113
\$2.0 million < \$3.5 million	492	167,962	1,071	161,902	939	226,752	1,575	321,379
\$3.5 million < \$5.0 million	128	51,794	471	177,423	357	151,230	570	157,779
\$5.0 million < \$10.0 million	124	79,942	443	266,591	432	209,976	585	315,503
\$10.0 million < \$20.0 million	38	27,511	194	272,213	163	154,489	222	273,637
\$20.0 million or more	19	64,102	98	870,694	96	574,643	110	320,452

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1a. Estate Tax Returns Filed in 2004 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Retirement assets		Depletables/intangibles		Art		Other assets	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
All returns	37,588	14,510,063	3,678	703,495	3,556	1,430,934	55,768	3,024,901
Under \$1.0 million	855	140,238	113	4,027	**	**	1,698	33,871
\$1.0 million < \$1.5 million	14,389	3,345,864	1,091	44,889	** 619	** 9,136	21,187	507,822
\$1.5 million < \$2.0 million	8,291	2,535,325	645	47,549	486	23,484	11,536	318,406
\$2.0 million < \$3.5 million	8,412	3,824,736	925	111,959	916	70,260	12,201	477,056
\$3.5 million < \$5.0 million	2,326	1,535,543	291	56,861	380	35,388	3,740	239,866
\$5.0 million < \$10.0 million	2,196	1,743,333	377	89,488	547	104,992	3,470	335,992
\$10.0 million < \$20.0 million	741	779,849	137	76,617	323	145,285	1,231	225,055
\$20.0 million or more	377	605,174	99	272,106	285	1,042,388	706	886,833
All taxable returns	15,475	5,754,399	2,008	265,462	2,075	1,057,022	26,890	1,660,056
Under \$1.0 million	327	51,644	**	**	**	**	800	17,305
\$1.0 million < \$1.5 million	5,002	1,147,268	** 618	** 18,625	** 287	** 4,112	8,554	148,601
\$1.5 million < \$2.0 million	3,701	997,964	353	12,904	282	5,093	5,941	145,868
\$2.0 million < \$3.5 million	3,760	1,506,517	517	62,582	529	38,859	6,412	218,537
\$3.5 million < \$5.0 million	1,024	626,661	154	29,299	199	23,256	1,925	92,784
\$5.0 million < \$10.0 million	1,035	733,436	203	31,765	341	74,257	1,992	186,770
\$10.0 million < \$20.0 million	389	340,577	87	40,464	219	73,012	758	158,959
\$20.0 million or more	237	350,333	74	69,824	218	838,433	507	691,231
All nontaxable returns	22,112	8,755,664	1,671	438,034	1,481	373,912	28,879	1,364,845
Under \$1.0 million	527	88,594	**	**	**	**	898	16,566
\$1.0 million < \$1.5 million	9,387	2,198,596	** 585	** 30,291	** 331	** 5,024	12,633	359,221
\$1.5 million < \$2.0 million	4,590	1,537,361	292	34,646	205	18,391	5,594	172,538
\$2.0 million < \$3.5 million	4,652	2,318,220	408	49,378	387	31,402	5,788	258,519
\$3.5 million < \$5.0 million	1,303	908,882	137	27,562	181	12,132	1,815	147,082
\$5.0 million < \$10.0 million	1,161	1,009,897	174	57,723	206	30,735	1,477	149,222
\$10.0 million < \$20.0 million	352	439,272	49	36,153	104	72,273	473	66,096
\$20.0 million or more	140	254,842	24	202,282	66	203,955	199	195,602

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1a. Estate Tax Returns Filed in 2004 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of deductions							
	Funeral expenses		Executors' commissions		Attorneys' fees		Other expenses/losses	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(49)	(50)	(51)	(52)	(53)	(54)	(55)	(56)
All returns	57,224	500,464	22,873	1,350,490	40,197	1,078,328	40,993	1,049,075
Under \$1.0 million	2,128	17,193	757	13,173	1,568	18,719	1,652	14,086
\$1.0 million < \$1.5 million	21,956	165,042	8,452	217,226	15,021	215,798	15,476	157,692
\$1.5 million < \$2.0 million	11,937	93,733	4,501	165,200	8,533	162,630	8,710	139,725
\$2.0 million < \$3.5 million	12,132	110,449	5,156	261,878	8,440	224,736	8,487	183,749
\$3.5 million < \$5.0 million	3,752	39,078	1,550	128,181	2,690	104,056	2,641	80,682
\$5.0 million < \$10.0 million	3,433	40,866	1,550	198,551	2,513	141,471	2,568	141,646
\$10.0 million < \$20.0 million	1,210	18,217	570	120,690	912	83,321	926	106,751
\$20.0 million or more	676	15,885	337	245,589	520	127,597	532	224,744
All taxable returns	29,906	250,750	18,359	1,169,942	26,698	830,060	26,959	896,237
Under \$1.0 million	1,010	7,096	463	6,418	839	8,380	935	8,289
\$1.0 million < \$1.5 million	9,831	69,198	5,804	156,823	8,506	133,451	8,700	97,189
\$1.5 million < \$2.0 million	6,715	50,145	3,932	142,873	6,083	120,642	6,063	109,051
\$2.0 million < \$3.5 million	6,944	58,685	4,581	235,152	6,326	184,418	6,312	164,987
\$3.5 million < \$5.0 million	2,056	20,233	1,350	115,282	1,922	81,907	1,900	74,092
\$5.0 million < \$10.0 million	2,077	23,120	1,404	183,482	1,891	117,525	1,913	127,146
\$10.0 million < \$20.0 million	778	10,924	516	110,365	702	70,228	707	100,054
\$20.0 million or more	494	11,351	309	219,547	429	113,508	429	215,429
All nontaxable returns	27,318	249,713	4,514	180,548	13,498	248,268	14,034	152,838
Under \$1.0 million	1,118	10,097	294	6,755	729	10,339	717	5,797
\$1.0 million < \$1.5 million	12,125	95,844	2,648	60,404	6,515	82,346	6,776	60,502
\$1.5 million < \$2.0 million	5,222	43,589	569	22,328	2,450	41,988	2,647	30,674
\$2.0 million < \$3.5 million	5,187	51,765	575	26,726	2,114	40,318	2,175	18,762
\$3.5 million < \$5.0 million	1,696	18,845	201	12,898	769	22,149	741	6,590
\$5.0 million < \$10.0 million	1,355	17,746	146	15,069	622	23,946	655	14,500
\$10.0 million < \$20.0 million	431	7,293	54	10,325	210	13,093	219	6,697
\$20.0 million or more	182	4,534	28	26,042	91	14,090	103	9,315

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1a. Estate Tax Returns Filed in 2004 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of deductions—continued							
	Debts and mortgages		Bequests to surviving spouse		Charitable deduction		Allowable deductions	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(57)	(58)	(59)	(60)	(61)	(62)	(63)	(64)
All returns	47,555	7,780,526	27,380	60,188,300	11,861	14,967,967	64,981	87,450,596
Under \$1.0 million	1,660	71,096	663	264,822	262	9,769	2,316	414,833
\$1.0 million < \$1.5 million	17,558	953,830	9,062	4,626,902	3,779	806,756	25,102	7,283,114
\$1.5 million < \$2.0 million	9,857	844,510	5,814	4,917,675	2,236	819,135	13,577	7,258,415
\$2.0 million < \$3.5 million	10,305	1,355,115	6,668	10,208,542	2,823	1,860,126	13,936	14,343,089
\$3.5 million < \$5.0 million	3,343	636,843	2,183	6,292,197	933	922,029	4,195	8,242,501
\$5.0 million < \$10.0 million	3,050	1,047,290	1,912	9,512,834	1,041	1,755,364	3,804	12,876,218
\$10.0 million < \$20.0 million	1,135	706,395	681	6,907,349	456	1,454,373	1,315	9,425,514
\$20.0 million or more	648	2,165,447	398	17,457,978	330	7,340,415	736	27,606,913
All taxable returns	26,902	3,474,569	2,564	11,234,987	6,800	8,512,100	31,315	26,745,764
Under \$1.0 million	862	19,369	**	**	157	2,082	1,053	57,770
\$1.0 million < \$1.5 million	8,507	227,719	** 225	** 19,226	1,557	61,772	10,269	810,499
\$1.5 million < \$2.0 million	5,972	349,026	375	120,256	1,353	133,844	7,048	1,100,884
\$2.0 million < \$3.5 million	6,339	564,075	772	549,846	1,776	435,274	7,290	2,309,989
\$3.5 million < \$5.0 million	1,987	248,515	345	521,586	620	285,362	2,162	1,377,515
\$5.0 million < \$10.0 million	1,989	470,697	422	1,346,557	712	779,815	2,164	3,098,064
\$10.0 million < \$20.0 million	759	436,779	220	1,339,042	354	771,603	808	2,865,309
\$20.0 million or more	487	1,158,390	204	7,338,475	272	6,042,347	520	15,125,733
All nontaxable returns	20,653	4,305,957	24,815	48,953,312	5,062	6,455,867	33,666	60,704,832
Under \$1.0 million	797	51,727	**	**	* 105	* 7,687	1,263	357,063
\$1.0 million < \$1.5 million	9,051	726,111	** 9,498	** 4,872,498	2,222	744,984	14,833	6,472,615
\$1.5 million < \$2.0 million	3,885	495,484	5,439	4,797,420	884	685,290	6,529	6,157,531
\$2.0 million < \$3.5 million	3,966	791,040	5,896	9,658,696	1,048	1,424,852	6,646	12,033,099
\$3.5 million < \$5.0 million	1,356	388,328	1,837	5,770,611	313	636,667	2,033	6,864,985
\$5.0 million < \$10.0 million	1,061	576,593	1,489	8,166,277	329	975,549	1,640	9,778,154
\$10.0 million < \$20.0 million	376	269,616	461	5,568,306	103	682,770	507	6,560,205
\$20.0 million or more	161	1,007,057	194	10,119,503	58	1,298,067	216	12,481,180

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1a. Estate Tax Returns Filed in 2004 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Taxable estate		Adjusted taxable gifts		Adjusted taxable estate		Tentative estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(65)	(66)	(67)	(68)	(69)	(70)	(71)	(72)
All returns	62,002	107,204,135	12,181	7,834,604	62,205	115,038,739	62,201	46,802,932
Under \$1.0 million	2,154	1,410,114	1,440	944,291	2,172	2,354,405	2,170	849,735
\$1.0 million < \$1.5 million	23,952	23,392,193	2,113	578,398	24,001	23,970,591	24,001	8,387,500
\$1.5 million < \$2.0 million	12,959	16,120,287	1,675	548,366	12,970	16,668,653	12,968	6,133,885
\$2.0 million < \$3.5 million	13,203	21,464,048	2,679	1,093,905	13,235	22,557,953	13,235	8,855,211
\$3.5 million < \$5.0 million	4,040	9,155,269	1,329	778,217	4,060	9,933,486	4,060	4,182,918
\$5.0 million < \$10.0 million	3,721	13,129,353	1,639	1,348,229	3,748	14,477,583	3,748	6,450,335
\$10.0 million < \$20.0 million	1,266	8,485,240	756	897,618	1,292	9,382,858	1,292	4,373,233
\$20.0 million or more	706	14,047,630	550	1,645,580	727	15,693,211	726	7,570,116
All taxable returns	31,328	81,745,096	7,847	5,951,001	31,329	87,696,097	31,329	37,348,870
Under \$1.0 million	1,053	752,774	806	535,621	1,053	1,288,395	1,053	465,075
\$1.0 million < \$1.5 million	10,269	12,142,970	1,310	411,101	10,269	12,554,071	10,269	4,504,159
\$1.5 million < \$2.0 million	7,057	11,093,758	1,085	389,837	7,057	11,483,595	7,057	4,340,711
\$2.0 million < \$3.5 million	7,290	16,350,182	1,777	844,145	7,290	17,194,328	7,290	6,999,697
\$3.5 million < \$5.0 million	2,165	7,549,380	834	577,368	2,165	8,126,748	2,165	3,554,990
\$5.0 million < \$10.0 million	2,166	11,812,178	1,108	1,091,794	2,166	12,903,972	2,166	5,897,589
\$10.0 million < \$20.0 million	807	8,137,469	510	720,739	808	8,858,208	808	4,186,183
\$20.0 million or more	520	13,906,386	417	1,380,394	520	15,286,780	520	7,400,467
All nontaxable returns	30,674	25,459,039	4,334	1,883,603	30,877	27,342,642	30,872	9,454,063
Under \$1.0 million	1,100	657,340	634	408,670	1,119	1,066,010	1,117	384,660
\$1.0 million < \$1.5 million	13,682	11,249,223	803	167,296	13,732	11,416,520	13,732	3,883,341
\$1.5 million < \$2.0 million	5,902	5,026,530	590	158,528	5,913	5,185,058	5,911	1,793,173
\$2.0 million < \$3.5 million	5,913	5,113,866	902	249,759	5,945	5,363,625	5,945	1,855,514
\$3.5 million < \$5.0 million	1,875	1,605,889	495	200,849	1,895	1,806,738	1,895	627,929
\$5.0 million < \$10.0 million	1,556	1,317,176	531	256,435	1,582	1,573,611	1,582	552,746
\$10.0 million < \$20.0 million	459	347,771	246	176,879	484	524,650	484	187,050
\$20.0 million or more	186	141,245	133	265,186	207	406,431	206	169,649

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1a. Estate Tax Returns Filed in 2004 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Gift tax		Total tax before credits		Allowable unified credit		State death tax credit	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(73)	(74)	(75)	(76)	(77)	(78)	(79)	(80)
All returns	2,698	1,508,952	62,164	45,301,833	65,039	23,230,526	34,026	3,178,663
Under \$1.0 million	353	113,487	2,169	743,075	2,321	692,916	1,183	13,733
\$1.0 million < \$1.5 million	278	28,580	24,001	8,358,920	25,141	8,620,362	12,211	258,833
\$1.5 million < \$2.0 million	219	33,730	12,962	6,100,682	13,586	5,070,126	7,321	247,990
\$2.0 million < \$3.5 million	432	122,826	13,212	8,732,385	13,936	5,164,056	7,488	432,291
\$3.5 million < \$5.0 million	285	93,307	4,060	4,089,611	4,198	1,553,082	2,243	254,754
\$5.0 million < \$10.0 million	505	259,998	3,746	6,190,337	3,806	1,388,793	2,230	500,871
\$10.0 million < \$20.0 million	314	223,605	1,290	4,149,628	1,315	474,706	827	462,541
\$20.0 million or more	312	633,419	724	6,937,195	736	266,486	524	1,007,650
All taxable returns	1,992	1,212,978	31,329	36,135,892	31,329	11,240,545	30,896	3,144,091
Under \$1.0 million	255	18,718	1,053	446,356	1,053	331,251	961	11,966
\$1.0 million < \$1.5 million	133	22,709	10,269	4,481,450	10,269	3,525,037	10,090	236,334
\$1.5 million < \$2.0 million	133	25,925	7,057	4,314,786	7,057	2,598,109	7,017	244,607
\$2.0 million < \$3.5 million	321	95,027	7,290	6,904,670	7,290	2,714,673	7,218	428,936
\$3.5 million < \$5.0 million	226	81,801	2,165	3,473,188	2,165	802,037	2,154	253,642
\$5.0 million < \$10.0 million	410	236,574	2,166	5,661,014	2,166	788,160	2,150	499,348
\$10.0 million < \$20.0 million	248	194,329	808	3,991,854	808	292,353	799	461,754
\$20.0 million or more	266	537,894	520	6,862,573	520	188,924	507	1,007,506
All nontaxable returns	705	295,974	30,835	9,165,941	33,710	11,989,981	3,130	34,572
Under \$1.0 million	98	94,768	1,116	296,719	1,267	361,665	222	1,767
\$1.0 million < \$1.5 million	146	5,871	13,732	3,877,470	14,872	5,095,324	2,121	22,500
\$1.5 million < \$2.0 million	86	7,805	5,905	1,785,895	6,529	2,472,017	304	3,384
\$2.0 million < \$3.5 million	111	27,799	5,921	1,827,715	6,646	2,449,383	270	3,355
\$3.5 million < \$5.0 million	59	11,506	1,895	616,423	2,034	751,045	89	1,112
\$5.0 million < \$10.0 million	95	23,424	1,580	529,322	1,640	600,633	80	1,523
\$10.0 million < \$20.0 million	65	29,276	482	157,774	507	182,352	27	787
\$20.0 million or more	45	95,525	204	74,622	216	77,562	17	145

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1a. Estate Tax Returns Filed in 2004 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Other tax credits		Net estate tax		Generation skipping tax		Community property	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(81)	(82)	(83)	(84)	(85)	(86)	(87)	(88)
All returns	730	164,624	31,329	21,611,904	329	115,295	7,393	37,921,140
Under \$1.0 million	**	**	1,053	101,868	0	0	194	272,332
\$1.0 million < \$1.5 million	** 149	** 2,535	10,269	718,899	**	**	2,476	5,364,446
\$1.5 million < \$2.0 million	153	10,666	7,057	1,463,160	** 59	** 1,500	1,550	4,383,651
\$2.0 million < \$3.5 million	167	25,413	7,290	3,740,913	83	6,429	1,804	7,403,728
\$3.5 million < \$5.0 million	97	18,587	2,165	2,400,227	* 13	* 660	619	4,162,530
\$5.0 million < \$10.0 million	94	32,155	2,166	4,350,019	71	21,364	496	5,302,619
\$10.0 million < \$20.0 million	35	13,323	808	3,224,425	43	19,439	174	3,421,942
\$20.0 million or more	34	61,943	520	5,612,394	59	65,904	80	7,609,894
All taxable returns	693	139,350	31,329	21,611,904	329	115,295	493	4,240,046
Under \$1.0 million	d	d	1,053	101,868	0	0	**	**
\$1.0 million < \$1.5 million	d	d	10,269	718,899	**	**	** 53	** 128,445
\$1.5 million < \$2.0 million	d	d	7,057	1,463,160	** 59	** 1,500	77	107,801
\$2.0 million < \$3.5 million	d	d	7,290	3,740,913	83	6,429	165	403,291
\$3.5 million < \$5.0 million	d	d	2,165	2,400,227	* 13	* 660	56	318,607
\$5.0 million < \$10.0 million	d	d	2,166	4,350,019	71	21,364	70	485,988
\$10.0 million < \$20.0 million	d	d	808	3,224,425	43	19,439	41	448,644
\$20.0 million or more	d	d	520	5,612,394	59	65,904	31	2,347,270
All nontaxable returns	37	25,274	0	0	0	0	6,900	33,681,094
Under \$1.0 million	d	d	0	0	0	0	**	**
\$1.0 million < \$1.5 million	d	d	0	0	0	0	** 2,617	** 5,508,333
\$1.5 million < \$2.0 million	d	d	0	0	0	0	1,473	4,275,849
\$2.0 million < \$3.5 million	d	d	0	0	0	0	1,639	7,000,437
\$3.5 million < \$5.0 million	d	d	0	0	0	0	562	3,843,923
\$5.0 million < \$10.0 million	d	d	0	0	0	0	426	4,816,631
\$10.0 million < \$20.0 million	d	d	0	0	0	0	133	2,973,298
\$20.0 million or more	d	d	0	0	0	0	49	5,262,624

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1a. Estate Tax Returns Filed in 2004 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Total mutual funds		Total joint property		Total lifetime transfers		Qualified terminable interest property	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(89)	(90)	(91)	(92)	(93)	(94)	(95)	(96)
All returns	44,891	16,169,322	31,213	11,589,737	25,755	58,710,746	10,895	27,472,448
Under \$1.0 million	1,344	164,836	984	163,029	934	493,191	232	48,755
\$1.0 million < \$1.5 million	17,013	3,421,795	11,293	2,254,502	8,490	7,125,797	2,372	713,374
\$1.5 million < \$2.0 million	9,499	2,525,031	6,751	1,752,072	5,196	6,030,412	2,137	1,099,326
\$2.0 million < \$3.5 million	9,672	3,604,309	7,130	2,427,350	6,116	10,156,659	3,069	3,165,403
\$3.5 million < \$5.0 million	3,069	1,587,618	2,156	1,183,919	1,824	4,679,969	1,163	2,517,350
\$5.0 million < \$10.0 million	2,783	1,890,861	1,894	1,400,994	1,945	8,397,076	1,162	4,380,739
\$10.0 million < \$20.0 million	965	1,084,707	648	911,294	753	6,470,443	453	3,962,520
\$20.0 million or more	546	1,890,165	359	1,496,578	497	15,357,198	308	11,584,981
All taxable returns	21,463	8,926,744	10,489	3,271,838	12,852	34,893,279	1,013	6,339,831
Under \$1.0 million	587	91,565	304	27,783	459	248,789	**	**
\$1.0 million < \$1.5 million	7,139	1,630,098	3,193	566,534	3,349	2,980,658	** 79	** 10,373
\$1.5 million < \$2.0 million	4,797	1,415,488	2,462	543,064	2,806	3,312,545	87	39,308
\$2.0 million < \$3.5 million	4,949	1,973,289	2,540	637,040	3,241	5,496,951	218	168,550
\$3.5 million < \$5.0 million	1,493	825,327	751	253,854	981	2,572,283	146	211,780
\$5.0 million < \$10.0 million	1,543	1,137,321	740	361,445	1,159	4,988,841	212	589,509
\$10.0 million < \$20.0 million	570	679,040	290	269,686	495	4,128,680	125	804,256
\$20.0 million or more	386	1,174,616	209	612,432	362	11,164,532	146	4,516,054
All nontaxable returns	23,427	7,242,578	20,725	8,317,899	12,903	23,817,467	9,883	21,132,617
Under \$1.0 million	757	73,270	680	135,246	475	244,402	**	**
\$1.0 million < \$1.5 million	9,873	1,791,697	8,100	1,687,968	5,141	4,145,139	** 2,525	** 751,756
\$1.5 million < \$2.0 million	4,702	1,109,543	4,289	1,209,008	2,391	2,717,867	2,049	1,060,017
\$2.0 million < \$3.5 million	4,724	1,631,019	4,590	1,790,309	2,875	4,659,708	2,851	2,996,853
\$3.5 million < \$5.0 million	1,576	762,291	1,405	930,065	844	2,107,686	1,017	2,305,569
\$5.0 million < \$10.0 million	1,240	753,541	1,154	1,039,548	786	3,408,235	950	3,791,230
\$10.0 million < \$20.0 million	395	405,667	358	641,608	259	2,341,763	328	3,158,264
\$20.0 million or more	160	715,549	150	884,147	135	4,192,666	162	7,068,927

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

** Data were combined to prevent disclosure of individual taxpayer data.

d—Data were deleted to prevent disclosure of individual taxpayer data. However, data are included in the appropriate totals.

[1] The majority of estates file Federal estate tax returns in the year after a decedent's death. So, in 2004, most returns were filed for deaths that occurred in 2003, for which the filing threshold was \$1.0 million. Because of filing extensions, however, some returns were filed for deaths that occurred prior to 2002, for which the filing thresholds were lower. For deaths that occurred in 2004, the filing threshold was \$1.5 million.

[2] Gross estate is shown at the value used to determine estate tax liability. Gross estate could be reported as of date of death or 6 months thereafter (i.e., alternate valuation method).

[3] The "Farm assets" category does not include farmland. Farmland was included in the "Other real estate" category.

NOTE: Detail may not add to total due to rounding.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1b. Estate Tax Returns Filed in 2005 [1], by Tax Status and Size of Gross Estate

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

Tax status and size of gross estate	Gross estate for tax purposes [2]		Type of property					
			Personal residence		Other real estate [3]		Real estate partnerships	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All returns	45,070	184,696,403	29,934	15,694,090	28,326	24,014,845	2,815	3,114,485
Under \$1.5 million	5,590	6,616,339	3,565	1,078,352	3,200	1,201,420	152	36,609
\$1.5 million < \$2.0 million	13,955	24,047,230	9,133	3,561,599	8,191	3,807,155	551	143,842
\$2.0 million < \$3.5 million	14,842	38,162,443	9,860	4,724,484	9,493	6,161,907	803	275,763
\$3.5 million < \$5.0 million	4,445	18,386,313	3,018	1,782,560	2,839	2,615,898	376	248,830
\$5.0 million < \$10.0 million	4,122	28,001,268	2,824	2,181,350	2,951	4,076,066	498	552,801
\$10.0 million < \$20.0 million	1,358	18,649,863	954	1,127,816	1,031	2,472,543	240	434,033
\$20.0 million or more	760	50,832,948	579	1,237,929	621	3,679,856	196	1,422,608
All taxable returns	20,250	104,014,530	12,546	7,492,346	12,047	10,908,295	1,115	1,238,023
Under \$1.5 million	1,820	2,242,624	1,040	330,752	978	333,119	* 25	* 4,726
\$1.5 million < \$2.0 million	5,237	9,258,132	3,160	1,331,745	2,810	1,228,910	224	70,108
\$2.0 million < \$3.5 million	7,311	18,938,695	4,486	2,272,925	4,394	2,775,657	273	98,322
\$3.5 million < \$5.0 million	2,282	9,433,164	1,407	806,361	1,308	1,082,687	140	98,498
\$5.0 million < \$10.0 million	2,280	15,590,318	1,533	1,195,327	1,553	1,969,259	224	196,843
\$10.0 million < \$20.0 million	822	11,251,943	543	691,243	607	1,243,485	117	193,450
\$20.0 million or more	498	37,299,654	376	863,992	397	2,275,177	112	576,076
All nontaxable returns	24,820	80,681,873	17,388	8,201,744	16,279	13,106,550	1,701	1,876,462
Under \$1.5 million	3,770	4,373,715	2,524	747,600	2,223	868,301	127	31,882
\$1.5 million < \$2.0 million	8,718	14,789,098	5,973	2,229,854	5,381	2,578,246	327	73,733
\$2.0 million < \$3.5 million	7,531	19,223,748	5,374	2,451,559	5,099	3,386,250	529	177,441
\$3.5 million < \$5.0 million	2,163	8,953,149	1,611	976,199	1,531	1,533,211	236	150,332
\$5.0 million < \$10.0 million	1,841	12,410,950	1,292	986,022	1,398	2,106,807	274	355,958
\$10.0 million < \$20.0 million	536	7,397,919	411	436,573	424	1,229,057	124	240,583
\$20.0 million or more	261	13,533,294	203	373,936	223	1,404,679	84	846,532

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1b. Estate Tax Returns Filed in 2005 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Closely held stock		Publicly traded stock		State and local bonds		Federal savings bonds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All returns	6,884	11,767,826	36,487	50,994,303	23,793	18,852,688	5,329	426,847
Under \$1.5 million	606	173,687	3,960	979,206	2,065	420,896	745	49,520
\$1.5 million < \$2.0 million	1,195	376,699	10,967	4,904,971	6,904	1,961,162	1,682	121,743
\$2.0 million < \$3.5 million	2,149	1,059,537	12,195	8,843,754	7,916	3,280,663	1,956	150,606
\$3.5 million < \$5.0 million	955	817,655	3,819	4,728,380	2,722	1,924,960	477	51,890
\$5.0 million < \$10.0 million	1,101	1,434,333	3,633	7,826,302	2,699	3,364,514	339	41,607
\$10.0 million < \$20.0 million	505	1,411,321	1,220	5,422,622	942	2,354,650	95	9,318
\$20.0 million or more	373	6,494,593	691	18,289,068	544	5,545,843	36	2,161
All taxable returns	2,642	5,929,135	16,973	34,436,366	11,913	12,469,636	2,500	247,613
Under \$1.5 million	118	29,890	1,318	417,363	724	149,983	257	25,796
\$1.5 million < \$2.0 million	329	97,607	4,204	2,151,932	2,756	875,893	633	54,389
\$2.0 million < \$3.5 million	813	424,440	6,166	4,965,414	4,323	1,885,299	1,044	106,371
\$3.5 million < \$5.0 million	399	311,676	2,018	2,912,084	1,500	1,170,170	281	36,462
\$5.0 million < \$10.0 million	508	620,961	2,049	5,036,734	1,603	2,092,877	207	17,267
\$10.0 million < \$20.0 million	255	595,889	753	3,761,645	615	1,595,638	52	5,821
\$20.0 million or more	220	3,848,672	465	15,191,194	392	4,699,778	25	1,507
All nontaxable returns	4,242	5,838,691	19,513	16,557,936	11,879	6,383,051	2,829	179,234
Under \$1.5 million	488	143,797	2,643	561,843	1,341	270,913	489	23,724
\$1.5 million < \$2.0 million	866	279,092	6,763	2,753,039	4,149	1,085,269	1,049	67,354
\$2.0 million < \$3.5 million	1,336	635,097	6,029	3,878,340	3,592	1,395,364	912	44,236
\$3.5 million < \$5.0 million	556	505,980	1,801	1,816,296	1,222	754,790	195	15,428
\$5.0 million < \$10.0 million	593	813,373	1,584	2,789,568	1,096	1,271,637	131	24,340
\$10.0 million < \$20.0 million	250	815,432	467	1,660,976	327	759,012	42	3,497
\$20.0 million or more	153	2,645,921	226	3,097,874	152	846,065	11	654

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1b. Estate Tax Returns Filed in 2005 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Other Federal bonds		Corporate and foreign bonds		Bond funds		Unclassifiable mutual funds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
All returns	11,511	4,813,199	13,509	2,371,382	4,149	380,011	8,301	1,058,574
Under \$1.5 million	1,123	145,741	1,359	111,997	455	14,440	1,042	84,744
\$1.5 million < \$2.0 million	3,351	543,536	4,039	381,758	1,358	67,496	2,557	196,924
\$2.0 million < \$3.5 million	4,004	757,008	4,576	570,611	1,388	103,957	2,767	268,131
\$3.5 million < \$5.0 million	1,201	412,208	1,457	224,375	396	52,059	812	138,111
\$5.0 million < \$10.0 million	1,136	515,153	1,340	356,257	375	45,377	750	147,911
\$10.0 million < \$20.0 million	405	388,538	460	229,623	117	49,666	236	89,675
\$20.0 million or more	291	2,051,016	278	496,759	60	47,015	138	133,076
All taxable returns	5,922	3,314,669	6,713	1,466,003	1,930	248,234	3,565	545,086
Under \$1.5 million	379	48,383	533	59,431	142	2,911	397	25,134
\$1.5 million < \$2.0 million	1,510	273,030	1,556	152,345	492	27,046	915	87,491
\$2.0 million < \$3.5 million	2,195	440,861	2,483	343,880	736	68,908	1,231	137,946
\$3.5 million < \$5.0 million	672	269,327	853	153,318	224	36,655	389	70,225
\$5.0 million < \$10.0 million	680	329,604	789	202,711	221	35,564	397	87,036
\$10.0 million < \$20.0 million	274	247,590	305	145,527	73	34,019	148	46,366
\$20.0 million or more	212	1,705,875	193	408,792	42	43,131	90	90,889
All nontaxable returns	5,589	1,498,530	6,797	905,379	2,219	131,777	4,736	513,487
Under \$1.5 million	744	97,357	826	52,567	313	11,529	645	59,610
\$1.5 million < \$2.0 million	1,841	270,505	2,483	229,413	866	40,450	1,642	109,433
\$2.0 million < \$3.5 million	1,809	316,147	2,092	226,731	652	35,049	1,536	130,185
\$3.5 million < \$5.0 million	529	142,882	604	71,058	172	15,404	424	67,886
\$5.0 million < \$10.0 million	456	185,549	551	153,547	154	9,813	353	60,876
\$10.0 million < \$20.0 million	132	140,949	155	84,097	43	15,647	88	43,310
\$20.0 million or more	78	345,141	85	87,967	18	3,884	48	42,187

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1b. Estate Tax Returns Filed in 2005 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Cash		Cash management accounts		Insurance, face value		Insurance, policy loans	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
All returns	43,323	11,035,139	32,214	6,913,400	22,536	3,978,088	2,295	87,349
Under \$1.5 million	5,262	671,579	3,409	281,997	2,847	275,121	280	7,499
\$1.5 million < \$2.0 million	13,518	2,456,996	9,412	866,733	7,047	805,408	609	7,270
\$2.0 million < \$3.5 million	14,160	2,749,726	10,804	1,572,693	7,486	1,396,931	768	30,802
\$3.5 million < \$5.0 million	4,309	1,154,569	3,460	733,178	2,113	520,964	215	9,194
\$5.0 million < \$10.0 million	3,998	1,534,543	3,340	1,113,951	2,068	592,706	270	15,663
\$10.0 million < \$20.0 million	1,328	903,398	1,135	789,858	623	212,527	106	11,005
\$20.0 million or more	748	1,564,328	654	1,554,989	352	174,431	48	5,917
All taxable returns	19,723	6,757,323	15,221	4,295,699	8,396	977,128	820	34,187
Under \$1.5 million	1,748	285,744	1,223	113,315	786	54,533	* 63	* 1,264
\$1.5 million < \$2.0 million	5,117	1,183,538	3,586	431,514	2,167	143,474	240	2,634
\$2.0 million < \$3.5 million	7,064	1,755,881	5,553	932,870	3,062	302,718	237	6,883
\$3.5 million < \$5.0 million	2,237	733,528	1,819	409,828	833	120,805	75	4,003
\$5.0 million < \$10.0 million	2,247	947,124	1,904	704,909	993	190,449	123	8,486
\$10.0 million < \$20.0 million	813	601,759	704	530,197	337	77,876	51	6,423
\$20.0 million or more	496	1,249,748	432	1,173,065	218	87,274	30	4,494
All nontaxable returns	23,601	4,277,816	16,993	2,617,701	14,140	3,000,959	1,475	53,163
Under \$1.5 million	3,514	385,835	2,186	168,682	2,061	220,588	217	6,235
\$1.5 million < \$2.0 million	8,401	1,273,458	5,826	435,219	4,880	661,934	368	4,636
\$2.0 million < \$3.5 million	7,096	993,845	5,251	639,823	4,424	1,094,213	531	23,919
\$3.5 million < \$5.0 million	2,072	421,041	1,641	323,350	1,280	400,159	139	5,191
\$5.0 million < \$10.0 million	1,751	587,419	1,436	409,042	1,075	402,258	147	7,177
\$10.0 million < \$20.0 million	515	301,639	431	259,661	286	134,651	54	4,582
\$20.0 million or more	252	314,580	222	381,924	134	87,157	18	1,423

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1b. Estate Tax Returns Filed in 2005 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Farm assets [3]		Limited partnerships		Other noncorporate business assets		Mortgages and notes	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
All returns	2,800	1,213,649	6,445	4,830,832	4,882	2,810,049	10,047	3,956,778
Under \$1.5 million	323	65,336	461	65,456	423	30,141	905	138,844
\$1.5 million < \$2.0 million	858	173,575	1,218	159,296	951	173,027	2,594	385,880
\$2.0 million < \$3.5 million	871	227,950	2,128	498,462	1,522	301,564	2,961	633,351
\$3.5 million < \$5.0 million	267	149,390	798	256,499	604	149,964	1,218	471,815
\$5.0 million < \$10.0 million	276	148,619	1,041	646,666	754	343,650	1,367	653,928
\$10.0 million < \$20.0 million	115	154,588	450	636,906	334	265,716	589	548,986
\$20.0 million or more	90	294,191	350	2,567,548	293	1,545,987	413	1,123,974
All taxable returns	1,049	561,332	3,076	3,071,026	1,864	803,250	4,653	2,161,463
Under \$1.5 million	69	1,773	163	25,697	117	17,341	282	49,073
\$1.5 million < \$2.0 million	225	61,438	436	62,696	274	29,868	930	109,452
\$2.0 million < \$3.5 million	389	63,972	1,047	272,558	548	108,496	1,408	272,727
\$3.5 million < \$5.0 million	100	55,582	378	130,609	230	47,210	597	248,560
\$5.0 million < \$10.0 million	144	72,022	548	342,662	336	114,160	781	366,726
\$10.0 million < \$20.0 million	64	98,701	273	384,635	172	137,112	363	307,534
\$20.0 million or more	56	207,844	231	1,852,169	186	349,062	291	807,390
All nontaxable returns	1,751	652,317	3,369	1,759,806	3,018	2,006,799	5,395	1,795,315
Under \$1.5 million	254	63,564	297	39,759	306	12,800	623	89,771
\$1.5 million < \$2.0 million	633	112,136	782	96,600	677	143,159	1,664	276,428
\$2.0 million < \$3.5 million	482	163,978	1,082	225,904	974	193,068	1,553	360,624
\$3.5 million < \$5.0 million	167	93,808	420	125,890	375	102,754	621	223,254
\$5.0 million < \$10.0 million	132	76,597	493	304,004	417	229,490	585	287,202
\$10.0 million < \$20.0 million	51	55,887	177	252,271	162	128,604	226	241,452
\$20.0 million or more	33	86,347	119	715,379	107	1,196,924	123	316,584

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1b. Estate Tax Returns Filed in 2005 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Retirement assets		Depletable/intangibles		Art		Other assets	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
All returns	26,731	12,209,499	2,621	546,989	2,979	1,308,239	39,297	2,318,338
Under \$1.5 million	3,194	670,685	155	10,528	152	12,191	4,536	96,777
\$1.5 million < \$2.0 million	8,322	2,591,259	706	32,873	507	9,892	12,066	331,592
\$2.0 million < \$3.5 million	9,081	3,978,449	847	93,977	853	22,808	12,923	487,067
\$3.5 million < \$5.0 million	2,641	1,548,361	309	72,690	347	36,286	3,989	280,753
\$5.0 million < \$10.0 million	2,343	1,925,646	354	115,744	552	73,666	3,778	302,820
\$10.0 million < \$20.0 million	743	787,984	137	55,124	280	85,281	1,276	217,749
\$20.0 million or more	406	707,116	113	166,052	288	1,068,115	728	601,580
All taxable returns	10,318	4,499,950	1,301	329,351	1,652	859,046	17,590	1,303,529
Under \$1.5 million	917	234,618	* 33	* 569	* 29	* 324	1,435	27,943
\$1.5 million < \$2.0 million	2,707	781,913	277	5,724	156	2,360	4,383	98,173
\$2.0 million < \$3.5 million	3,843	1,428,352	453	35,149	467	9,446	6,314	221,423
\$3.5 million < \$5.0 million	1,128	533,570	149	23,551	197	15,028	2,066	150,408
\$5.0 million < \$10.0 million	1,112	782,384	220	84,077	380	34,499	2,131	162,367
\$10.0 million < \$20.0 million	381	338,210	95	34,020	200	45,301	773	132,886
\$20.0 million or more	230	400,903	75	146,261	223	752,089	489	510,329
All nontaxable returns	16,413	7,709,550	1,320	217,638	1,327	449,193	21,707	1,014,809
Under \$1.5 million	2,278	436,067	122	9,959	123	11,867	3,102	68,834
\$1.5 million < \$2.0 million	5,615	1,809,345	429	27,149	352	7,532	7,683	233,418
\$2.0 million < \$3.5 million	5,238	2,550,098	394	58,828	386	13,361	6,609	265,644
\$3.5 million < \$5.0 million	1,513	1,014,791	160	49,139	150	21,258	1,923	130,345
\$5.0 million < \$10.0 million	1,231	1,143,262	135	31,667	172	39,166	1,647	140,453
\$10.0 million < \$20.0 million	362	449,774	42	21,105	80	39,981	504	84,863
\$20.0 million or more	176	306,213	37	19,791	64	316,027	239	91,251

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1b. Estate Tax Returns Filed in 2005 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of deductions							
	Funeral expenses		Executors' commissions		Attorneys' fees		Other expenses/losses	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(49)	(50)	(51)	(52)	(53)	(54)	(55)	(56)
All returns	39,078	363,648	15,407	1,125,869	27,297	929,947	27,539	1,059,245
Under \$1.5 million	4,722	37,266	1,716	44,770	3,236	60,237	3,255	36,645
\$1.5 million < \$2.0 million	11,956	97,849	4,340	143,075	8,321	153,090	8,217	116,424
\$2.0 million < \$3.5 million	12,861	113,940	5,212	274,638	8,899	236,286	9,061	194,780
\$3.5 million < \$5.0 million	3,924	37,727	1,585	121,996	2,649	106,779	2,783	94,307
\$5.0 million < \$10.0 million	3,681	41,733	1,637	205,796	2,707	155,119	2,687	175,910
\$10.0 million < \$20.0 million	1,244	18,535	589	122,960	948	84,481	980	122,553
\$20.0 million or more	690	16,597	327	212,634	537	133,956	555	318,626
All taxable returns	19,275	175,201	12,086	981,488	17,478	710,604	17,184	910,276
Under \$1.5 million	1,676	13,324	895	24,377	1,514	25,578	1,361	16,595
\$1.5 million < \$2.0 million	4,951	38,713	2,884	102,363	4,530	89,803	4,358	69,106
\$2.0 million < \$3.5 million	6,974	57,277	4,605	245,393	6,288	190,365	6,268	169,229
\$3.5 million < \$5.0 million	2,216	19,528	1,413	111,790	1,971	87,611	1,998	69,592
\$5.0 million < \$10.0 million	2,191	22,994	1,477	187,706	2,018	127,629	2,020	160,645
\$10.0 million < \$20.0 million	794	11,504	516	111,521	728	69,854	739	112,757
\$20.0 million or more	473	11,860	297	198,337	430	119,763	440	312,350
All nontaxable returns	19,803	188,447	3,320	144,381	9,819	219,343	10,355	148,969
Under \$1.5 million	3,046	23,942	821	20,393	1,722	34,659	1,894	20,049
\$1.5 million < \$2.0 million	7,005	59,136	1,457	40,712	3,790	63,287	3,858	47,317
\$2.0 million < \$3.5 million	5,886	56,664	607	29,245	2,611	45,921	2,794	25,551
\$3.5 million < \$5.0 million	1,709	18,199	172	10,206	678	19,168	785	24,715
\$5.0 million < \$10.0 million	1,490	18,739	160	18,090	689	27,490	667	15,264
\$10.0 million < \$20.0 million	450	7,031	73	11,438	221	14,627	242	9,796
\$20.0 million or more	217	4,737	30	14,297	108	14,192	116	6,275

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1b. Estate Tax Returns Filed in 2005 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of deductions—continued							
	Debts and mortgages		Bequests to surviving spouse		Charitable deduction		Allowable deductions	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(57)	(58)	(59)	(60)	(61)	(62)	(63)	(64)
All returns	33,047	6,597,968	20,284	54,834,605	8,785	19,782,413	45,020	84,963,478
Under \$1.5 million	3,939	286,239	2,060	1,155,199	710	218,462	5,576	1,880,864
\$1.5 million < \$2.0 million	9,663	646,488	5,717	4,003,696	2,334	882,742	13,933	6,082,203
\$2.0 million < \$3.5 million	10,964	1,406,031	7,134	9,666,356	2,814	1,687,401	14,832	13,656,378
\$3.5 million < \$5.0 million	3,332	738,556	2,239	5,830,068	1,037	1,084,509	4,445	8,039,911
\$5.0 million < \$10.0 million	3,336	1,229,258	2,036	9,545,012	1,107	1,969,189	4,119	13,360,586
\$10.0 million < \$20.0 million	1,147	743,270	686	7,144,059	455	1,587,237	1,357	9,843,783
\$20.0 million or more	666	1,548,125	413	17,490,214	328	12,352,872	759	32,099,754
All taxable returns	17,673	3,232,470	1,754	8,929,206	4,565	13,544,121	20,203	28,688,127
Under \$1.5 million	1,429	56,410	* 46	* 14,079	221	11,665	1,807	179,867
\$1.5 million < \$2.0 million	4,369	162,348	169	45,092	711	50,721	5,216	586,184
\$2.0 million < \$3.5 million	6,462	561,271	490	306,853	1,634	327,840	7,300	1,917,735
\$3.5 million < \$5.0 million	2,040	340,230	298	412,519	657	302,585	2,282	1,367,860
\$5.0 million < \$10.0 million	2,138	613,334	376	934,751	734	784,364	2,279	2,864,836
\$10.0 million < \$20.0 million	768	411,691	199	1,324,837	348	910,661	821	2,971,045
\$20.0 million or more	467	1,087,184	176	5,891,074	260	11,156,285	497	18,800,600
All nontaxable returns	15,374	3,365,498	18,530	45,905,399	4,220	6,238,292	24,818	56,275,351
Under \$1.5 million	2,510	229,829	2,014	1,141,120	490	206,797	3,769	1,700,997
\$1.5 million < \$2.0 million	5,294	484,140	5,549	3,958,603	1,623	832,021	8,718	5,496,019
\$2.0 million < \$3.5 million	4,501	844,760	6,644	9,359,503	1,180	1,359,561	7,531	11,738,643
\$3.5 million < \$5.0 million	1,292	398,326	1,941	5,417,550	380	781,924	2,163	6,672,050
\$5.0 million < \$10.0 million	1,198	615,924	1,659	8,610,261	372	1,184,825	1,840	10,495,750
\$10.0 million < \$20.0 million	379	331,580	486	5,819,222	107	676,576	536	6,872,738
\$20.0 million or more	199	460,940	237	11,599,140	68	1,196,587	261	13,299,154

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1b. Estate Tax Returns Filed in 2005 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of deductions—continued		Taxable estate		Adjusted taxable gifts		Adjusted taxable estate	
	State death tax deduction [4]							
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(65)	(66)	(67)	(68)	(69)	(70)	(71)	(72)
All returns	696	120,938	41,158	96,208,611	9,745	6,943,330	42,778	106,670,453
Under \$1.5 million	* 23	* 1,198	5,122	4,687,651	1,157	664,670	5,203	5,408,119
\$1.5 million < \$2.0 million	267	15,060	12,670	17,201,224	1,809	572,770	13,225	18,526,442
\$2.0 million < \$3.5 million	212	27,139	13,462	23,571,194	2,517	997,740	14,011	25,500,225
\$3.5 million < \$5.0 million	63	9,691	4,084	9,992,662	1,235	705,597	4,254	11,049,665
\$5.0 million < \$10.0 million	79	26,785	3,836	14,098,039	1,724	1,273,415	4,008	15,950,908
\$10.0 million < \$20.0 million	40	21,980	1,264	8,434,391	771	865,494	1,331	9,649,781
\$20.0 million or more	12	19,085	719	18,223,450	532	1,863,644	746	20,585,313
All taxable returns	413	105,583	19,548	72,714,897	6,071	5,406,574	20,250	80,627,392
Under \$1.5 million	**	**	1,789	2,030,852	529	349,678	1,820	2,411,562
\$1.5 million < \$2.0 million	** 112	** 7,201	5,055	8,367,567	1,069	418,975	5,237	9,084,595
\$2.0 million < \$3.5 million	166	24,731	7,041	16,375,067	1,577	731,727	7,311	17,727,956
\$3.5 million < \$5.0 million	37	7,791	2,214	7,820,340	793	536,622	2,282	8,594,135
\$5.0 million < \$10.0 million	61	25,584	2,182	12,194,440	1,189	1,025,045	2,280	13,724,942
\$10.0 million < \$20.0 million	29	21,454	787	7,937,043	532	702,111	822	8,961,555
\$20.0 million or more	* 8	* 18,822	481	17,989,588	381	1,642,416	498	20,122,647
All nontaxable returns	283	15,355	21,610	23,493,714	3,674	1,536,756	22,527	26,043,060
Under \$1.5 million	**	**	3,334	2,656,800	628	314,992	3,383	2,996,558
\$1.5 million < \$2.0 million	** 179	** 9,058	7,615	8,833,657	740	153,795	7,988	9,441,847
\$2.0 million < \$3.5 million	* 46	* 2,408	6,421	7,196,127	940	266,013	6,700	7,772,269
\$3.5 million < \$5.0 million	25	1,900	1,870	2,172,323	442	168,975	1,971	2,455,530
\$5.0 million < \$10.0 million	18	1,201	1,654	1,903,599	535	248,369	1,728	2,225,965
\$10.0 million < \$20.0 million	11	525	477	497,347	238	163,384	509	688,227
\$20.0 million or more	* 4	* 262	238	233,862	151	221,228	248	462,665

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1b. Estate Tax Returns Filed in 2005 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Tentative estate tax		Gift tax		Total tax before credits		Allowable unified credit	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(73)	(74)	(75)	(76)	(77)	(78)	(79)	(80)
All returns	42,772	44,645,124	2,341	1,508,508	42,743	43,175,522	45,070	22,616,975
Under \$1.5 million	5,203	1,923,190	265	67,078	5,203	1,856,112	5,590	1,988,968
\$1.5 million < \$2.0 million	13,218	6,885,862	295	44,982	13,202	6,846,572	13,955	7,319,253
\$2.0 million < \$3.5 million	14,011	10,019,155	421	88,927	14,007	9,935,746	14,842	7,768,171
\$3.5 million < \$5.0 million	4,255	4,615,096	268	120,821	4,248	4,521,719	4,445	2,318,398
\$5.0 million < \$10.0 million	4,008	7,004,999	458	218,168	4,007	6,787,083	4,122	2,135,678
\$10.0 million < \$20.0 million	1,331	4,418,588	343	195,167	1,329	4,223,421	1,358	701,177
\$20.0 million or more	746	9,778,234	292	773,365	746	9,004,869	760	385,331
All taxable returns	20,250	35,232,599	1,745	1,280,245	20,250	33,952,354	20,250	10,270,293
Under \$1.5 million	1,820	882,976	121	22,850	1,820	860,126	1,820	671,921
\$1.5 million < \$2.0 million	5,237	3,470,791	212	30,903	5,237	3,439,887	5,237	2,712,074
\$2.0 million < \$3.5 million	7,311	7,211,933	332	66,219	7,311	7,145,715	7,311	3,823,010
\$3.5 million < \$5.0 million	2,282	3,721,082	197	79,958	2,282	3,641,125	2,282	1,196,535
\$5.0 million < \$10.0 million	2,280	6,188,556	381	196,408	2,280	5,992,148	2,280	1,189,995
\$10.0 million < \$20.0 million	822	4,163,336	270	174,290	822	3,989,047	822	424,899
\$20.0 million or more	498	9,593,924	232	709,617	498	8,884,307	498	251,859
All nontaxable returns	22,522	9,412,525	596	228,263	22,492	9,223,169	24,820	12,346,682
Under \$1.5 million	3,383	1,040,214	144	44,228	3,383	995,986	3,770	1,317,048
\$1.5 million < \$2.0 million	7,981	3,415,071	82	14,079	7,965	3,406,684	8,718	4,607,179
\$2.0 million < \$3.5 million	6,700	2,807,222	88	22,708	6,696	2,790,031	7,531	3,945,161
\$3.5 million < \$5.0 million	1,972	894,013	71	40,863	1,966	880,595	2,163	1,121,863
\$5.0 million < \$10.0 million	1,728	816,443	77	21,760	1,727	794,935	1,841	945,683
\$10.0 million < \$20.0 million	509	255,252	73	20,877	507	234,375	536	276,277
\$20.0 million or more	248	184,310	59	63,748	248	120,562	261	133,472

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1b. Estate Tax Returns Filed in 2005 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	State death tax credit [5]		Other tax credits		Net estate tax		Generation skipping tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(81)	(82)	(83)	(84)	(85)	(86)	(87)	(88)
All returns	20,156	1,861,784	661	194,276	20,250	21,671,503	215	166,259
Under \$1.5 million	2,169	40,815	* 54	* 1,625	1,820	150,514	**	**
\$1.5 million < \$2.0 million	5,342	110,769	125	10,038	5,237	617,196	**	**
\$2.0 million < \$3.5 million	6,947	254,078	186	31,791	7,311	3,042,889	** 70	** 4,881
\$3.5 million < \$5.0 million	2,215	147,427	100	16,849	2,282	2,283,190	* 17	* 2,533
\$5.0 million < \$10.0 million	2,197	291,783	102	45,683	2,280	4,477,023	42	12,984
\$10.0 million < \$20.0 million	802	257,948	51	32,345	822	3,275,972	34	10,294
\$20.0 million or more	483	758,964	43	55,944	498	7,824,719	51	135,567
All taxable returns	18,612	1,845,003	591	165,554	20,250	21,671,503	208	164,612
Under \$1.5 million	1,687	36,174	**	**	1,820	150,514	d	d
\$1.5 million < \$2.0 million	4,691	103,879	** 143	** 8,257	5,237	617,196	d	d
\$2.0 million < \$3.5 million	6,754	251,942	168	27,873	7,311	3,042,889	d	d
\$3.5 million < \$5.0 million	2,134	146,504	d	d	2,282	2,283,190	d	d
\$5.0 million < \$10.0 million	2,106	290,292	94	34,838	2,280	4,477,023	d	d
\$10.0 million < \$20.0 million	773	257,678	d	d	822	3,275,972	d	d
\$20.0 million or more	468	758,534	d	d	498	7,824,719	d	d
All nontaxable returns	1,544	16,780	70	28,722	0	0	7	1,647
Under \$1.5 million	482	4,641	**	**	0	0	d	d
\$1.5 million < \$2.0 million	651	6,890	** 36	** 3,406	0	0	d	d
\$2.0 million < \$3.5 million	194	2,136	* 18	* 3,918	0	0	d	d
\$3.5 million < \$5.0 million	81	923	d	d	0	0	d	d
\$5.0 million < \$10.0 million	92	1,491	* 8	* 10,845	0	0	d	d
\$10.0 million < \$20.0 million	29	270	d	d	0	0	d	d
\$20.0 million or more	15	430	d	d	0	0	d	d

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1b. Estate Tax Returns Filed in 2005 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Community property		Total mutual funds		Total joint property		Total lifetime transfers		Qualified terminable interest property	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(89)	(90)	(91)	(92)	(93)	(94)	(95)	(96)	(97)	(98)
All returns	5,675	35,076,480	30,863	13,345,674	21,847	9,250,969	19,138	62,168,872	8,000	25,273,312
Under \$1.5 million	630	1,279,559	3,678	724,341	2,340	509,810	1,666	1,376,570	562	173,366
\$1.5 million < \$2.0 million	1,656	4,965,665	9,235	2,469,217	6,841	1,741,864	5,493	6,362,177	1,565	621,119
\$2.0 million < \$3.5 million	1,976	8,052,850	10,394	3,585,687	7,577	2,711,151	6,468	11,072,434	2,816	2,406,222
\$3.5 million < \$5.0 million	623	3,868,798	3,133	1,660,945	2,128	1,237,063	2,075	5,609,704	1,083	2,019,902
\$5.0 million < \$10.0 million	528	5,631,724	2,910	2,047,976	1,958	1,463,683	2,165	9,586,066	1,216	4,348,403
\$10.0 million < \$20.0 million	159	3,556,391	976	1,155,316	640	762,901	787	6,750,785	445	3,657,583
\$20.0 million or more	103	7,721,493	537	1,702,193	361	824,498	486	21,411,136	315	12,046,717
All taxable returns	322	4,016,594	13,713	7,231,190	6,710	2,131,808	9,051	36,568,630	684	5,191,255
Under \$1.5 million	* 18	* 40,588	1,236	277,848	594	103,719	615	521,119	* 16	* 6,169
\$1.5 million < \$2.0 million	19	69,371	3,471	1,050,416	1,797	428,091	1,974	2,327,277	* 40	* 15,657
\$2.0 million < \$3.5 million	108	319,683	5,008	1,982,847	2,403	573,921	3,239	5,590,352	87	52,623
\$3.5 million < \$5.0 million	61	156,564	1,516	822,714	716	244,747	1,137	3,168,498	109	136,609
\$5.0 million < \$10.0 million	57	382,674	1,563	1,139,582	733	322,968	1,246	5,530,791	184	388,960
\$10.0 million < \$20.0 million	28	479,398	582	745,792	268	213,926	497	4,143,315	116	637,093
\$20.0 million or more	31	2,568,316	338	1,211,990	199	244,434	342	15,287,277	133	3,954,144
All nontaxable returns	5,353	31,059,886	17,150	6,114,484	15,137	7,119,161	10,087	25,600,243	7,316	20,082,057
Under \$1.5 million	612	1,238,971	2,442	446,492	1,747	406,090	1,050	855,451	546	167,196
\$1.5 million < \$2.0 million	1,636	4,896,294	5,765	1,418,801	5,044	1,313,773	3,519	4,034,900	1,524	605,462
\$2.0 million < \$3.5 million	1,869	7,733,168	5,386	1,602,840	5,174	2,137,230	3,228	5,482,082	2,729	2,353,600
\$3.5 million < \$5.0 million	563	3,712,233	1,617	838,231	1,413	992,315	937	2,441,206	974	1,883,293
\$5.0 million < \$10.0 million	471	5,249,050	1,347	908,393	1,225	1,140,715	918	4,055,276	1,032	3,959,443
\$10.0 million < \$20.0 million	131	3,076,993	394	409,524	372	548,975	290	2,607,469	329	3,020,490
\$20.0 million or more	71	5,153,177	199	490,203	162	580,063	144	6,123,859	182	8,092,573

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

** Data were combined to prevent disclosure of individual taxpayer data.

d—Data were deleted to prevent disclosure of individual taxpayer data. However, the data are included in the appropriate totals.

[1] The majority of estates file Federal estate tax returns in the year after a decedent's death. So, in 2005, most returns were filed for deaths that occurred in 2004, for which the filing threshold was \$1.5 million. Because of filing extensions, however, some returns were filed in 2005 for deaths that occurred prior to 2004, for which the filing thresholds were lower.

[2] Gross estate is shown at the value used to determine estate tax liability. Gross estate could be reported as of date of death or 6 months thereafter (i.e., alternate valuation method).

[3] The "Farm assets" category does not include farmland. Farmland was included in the "Other real estate" category.

[4] The state death tax deduction was available only for estates in which the decedent died in 2005.

[5] The state death tax credit was available only for estates in which the decedent died prior to 2005.

NOTE: Detail may not add to total due to rounding.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1c. Estate Tax Returns Filed in 2006 [1], by Tax Status and Size of Gross Estate

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

Tax status and size of gross estate	Gross estate for tax purposes [2]		Type of property					
			Personal residence		Other real estate [3]		Real estate partnerships	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All returns	49,050	211,460,077	32,578	18,899,792	31,786	29,119,067	3,397	3,955,892
Under \$1.5 million	2,009	2,337,055	1,160	346,442	1,035	353,996	84	31,707
\$1.5 million < \$2.0 million	14,856	25,610,795	9,517	3,965,201	8,927	4,339,930	534	162,990
\$2.0 million < \$3.5 million	18,857	48,672,849	12,625	6,204,192	12,228	8,147,327	1,110	536,156
\$3.5 million < \$5.0 million	5,629	23,282,496	3,825	2,483,147	3,952	3,896,501	544	329,016
\$5.0 million < \$10.0 million	5,053	34,142,415	3,548	2,958,785	3,576	5,062,060	555	650,359
\$10.0 million < \$20.0 million	1,708	22,983,958	1,219	1,491,287	1,301	3,133,113	319	684,145
\$20.0 million or more	939	54,430,509	685	1,450,738	766	4,186,140	251	1,561,520
All taxable returns	22,798	116,093,783	13,840	8,996,412	14,307	13,729,929	1,334	1,667,212
Under \$1.5 million	819	983,337	425	128,071	339	81,027	50	18,066
\$1.5 million < \$2.0 million	5,704	10,104,337	3,275	1,525,042	3,248	1,509,612	154	52,551
\$2.0 million < \$3.5 million	9,043	23,489,093	5,463	2,840,214	5,649	3,671,907	410	222,870
\$3.5 million < \$5.0 million	2,951	12,260,044	1,794	1,200,711	2,041	1,947,029	210	114,396
\$5.0 million < \$10.0 million	2,664	18,224,109	1,748	1,540,093	1,816	2,370,179	195	191,484
\$10.0 million < \$20.0 million	1,004	13,562,562	692	831,580	721	1,760,063	162	262,927
\$20.0 million or more	614	37,470,301	443	930,700	493	2,390,112	155	804,919
All nontaxable returns	26,253	95,366,294	18,739	9,903,380	17,478	15,389,139	2,063	2,288,681
Under \$1.5 million	1,190	1,353,717	735	218,371	696	272,969	34	13,641
\$1.5 million < \$2.0 million	9,152	15,506,458	6,242	2,440,159	5,678	2,830,319	380	110,439
\$2.0 million < \$3.5 million	9,814	25,183,757	7,162	3,363,977	6,579	4,475,420	701	313,286
\$3.5 million < \$5.0 million	2,678	11,022,452	2,031	1,282,436	1,912	1,949,472	334	214,620
\$5.0 million < \$10.0 million	2,390	15,918,306	1,800	1,418,692	1,760	2,691,881	360	458,875
\$10.0 million < \$20.0 million	704	9,421,396	527	659,707	581	1,373,050	157	421,218
\$20.0 million or more	324	16,960,208	241	520,038	274	1,796,028	96	756,601

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1c. Estate Tax Returns Filed in 2006 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Closely held stock		Publicly traded stock		State and local bonds		Federal savings bonds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All returns	7,567	13,526,160	39,776	54,464,151	26,377	19,227,060	5,428	417,972
Under \$1.5 million	172	59,414	1,392	361,172	770	167,829	161	10,385
\$1.5 million < \$2.0 million	1,422	473,448	11,457	5,177,781	7,189	2,035,683	1,832	129,874
\$2.0 million < \$3.5 million	2,481	1,241,340	15,265	10,807,008	10,006	4,099,806	2,278	184,687
\$3.5 million < \$5.0 million	1,212	966,171	4,795	5,459,707	3,252	2,199,739	584	51,181
\$5.0 million < \$10.0 million	1,223	1,738,135	4,467	9,467,522	3,308	3,754,140	411	28,003
\$10.0 million < \$20.0 million	602	1,579,513	1,539	6,343,384	1,193	2,779,062	113	10,614
\$20.0 million or more	454	7,468,141	860	16,847,577	659	4,190,802	49	3,228
All taxable returns	2,798	6,354,765	19,178	33,961,612	13,387	11,913,501	2,669	228,491
Under \$1.5 million	73	23,714	659	194,304	360	65,880	* 88	* 8,201
\$1.5 million < \$2.0 million	344	92,330	4,609	2,434,923	2,908	877,228	788	66,772
\$2.0 million < \$3.5 million	865	376,948	7,503	6,103,027	5,182	2,199,107	1,130	91,910
\$3.5 million < \$5.0 million	419	284,621	2,544	3,467,827	1,863	1,377,279	329	35,870
\$5.0 million < \$10.0 million	523	664,468	2,369	5,816,755	1,864	2,291,692	231	16,242
\$10.0 million < \$20.0 million	302	683,956	922	4,223,719	754	1,907,456	66	6,629
\$20.0 million or more	273	4,228,727	572	11,721,057	456	3,194,859	36	2,867
All nontaxable returns	4,769	7,171,396	20,598	20,502,539	12,990	7,313,559	2,760	189,481
Under \$1.5 million	99	35,699	733	166,868	410	101,948	* 74	* 2,184
\$1.5 million < \$2.0 million	1,079	381,118	6,849	2,742,858	4,281	1,158,455	1,044	63,102
\$2.0 million < \$3.5 million	1,617	864,392	7,763	4,703,981	4,824	1,900,699	1,148	92,777
\$3.5 million < \$5.0 million	794	681,550	2,252	1,991,879	1,389	822,460	254	15,311
\$5.0 million < \$10.0 million	701	1,073,667	2,097	3,650,767	1,444	1,462,448	180	11,761
\$10.0 million < \$20.0 million	300	895,557	617	2,119,664	439	871,607	47	3,985
\$20.0 million or more	181	3,239,413	288	5,126,520	203	995,943	13	361

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1c. Estate Tax Returns Filed in 2006 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Other Federal bonds		Corporate and foreign bonds		Bond funds		Unclassifiable mutual funds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
All returns	11,602	3,604,974	16,071	3,290,272	5,966	503,241	10,058	1,215,255
Under \$1.5 million	367	37,164	543	44,458	160	5,713	292	17,770
\$1.5 million < \$2.0 million	3,166	416,267	4,773	495,301	1,712	79,196	3,105	237,886
\$2.0 million < \$3.5 million	4,475	802,377	6,166	856,341	2,555	191,027	3,985	381,105
\$3.5 million < \$5.0 million	1,466	407,216	1,839	331,402	653	69,491	1,169	161,831
\$5.0 million < \$10.0 million	1,316	584,023	1,784	467,317	599	76,805	1,033	174,540
\$10.0 million < \$20.0 million	504	450,955	624	327,281	195	36,561	316	99,531
\$20.0 million or more	307	906,973	343	768,172	91	44,449	158	142,592
All taxable returns	6,257	2,289,307	8,125	2,070,587	3,059	337,268	4,571	648,763
Under \$1.5 million	102	15,141	329	25,896	* 97	* 3,863	162	8,263
\$1.5 million < \$2.0 million	1,493	209,581	1,930	227,200	725	43,485	1,157	100,151
\$2.0 million < \$3.5 million	2,403	501,346	3,171	528,925	1,358	127,804	1,892	204,439
\$3.5 million < \$5.0 million	896	247,764	1,036	217,895	364	51,036	586	104,149
\$5.0 million < \$10.0 million	814	380,150	1,019	303,718	339	56,091	488	96,469
\$10.0 million < \$20.0 million	324	286,041	405	243,658	110	19,293	189	71,694
\$20.0 million or more	224	649,284	235	523,295	67	35,695	97	63,599
All nontaxable returns	5,345	1,315,667	7,946	1,219,685	2,907	165,973	5,487	566,492
Under \$1.5 million	265	22,022	214	18,562	* 63	* 1,849	131	9,508
\$1.5 million < \$2.0 million	1,673	206,685	2,843	268,100	988	35,710	1,948	137,735
\$2.0 million < \$3.5 million	2,072	301,031	2,995	327,417	1,197	63,222	2,093	176,666
\$3.5 million < \$5.0 million	570	159,453	803	113,506	289	18,455	583	57,682
\$5.0 million < \$10.0 million	502	203,873	765	163,599	261	20,714	545	78,071
\$10.0 million < \$20.0 million	181	164,914	219	83,623	85	17,268	127	27,837
\$20.0 million or more	83	257,689	108	244,877	24	8,753	61	78,993

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1c. Estate Tax Returns Filed in 2006 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Cash		Cash management accounts		Insurance, face value		Insurance, policy loans	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
All returns	47,221	16,791,349	35,650	7,024,768	24,588	4,692,309	2,476	108,966
Under \$1.5 million	1,846	292,960	1,313	103,991	892	68,950	57	1,352
\$1.5 million < \$2.0 million	14,272	2,372,446	10,018	838,099	7,470	800,629	584	9,053
\$2.0 million < \$3.5 million	18,169	3,706,210	13,720	1,603,709	9,598	1,682,341	964	34,995
\$3.5 million < \$5.0 million	5,447	1,454,663	4,253	741,697	2,905	818,456	407	30,121
\$5.0 million < \$10.0 million	4,891	1,805,792	4,080	1,233,755	2,441	743,714	289	11,609
\$10.0 million < \$20.0 million	1,674	1,012,435	1,430	846,498	813	291,181	116	6,489
\$20.0 million or more	920	6,146,842	835	1,657,019	470	287,037	59	15,347
All taxable returns	22,248	12,029,433	17,108	4,215,530	9,760	1,311,748	713	34,375
Under \$1.5 million	766	139,058	530	45,194	381	18,230	* 13	* 85
\$1.5 million < \$2.0 million	5,549	1,103,811	4,030	357,481	2,407	136,700	72	521
\$2.0 million < \$3.5 million	8,817	2,155,102	6,678	880,933	3,924	396,234	309	8,548
\$3.5 million < \$5.0 million	2,892	908,566	2,278	427,328	1,266	220,904	128	9,680
\$5.0 million < \$10.0 million	2,622	1,168,330	2,186	764,452	1,097	227,669	105	3,020
\$10.0 million < \$20.0 million	992	693,696	854	534,332	408	102,042	52	2,629
\$20.0 million or more	610	5,860,869	552	1,205,808	276	209,970	34	9,892
All nontaxable returns	24,972	4,761,916	18,542	2,809,238	14,829	3,380,561	1,763	74,591
Under \$1.5 million	1,081	153,902	783	58,796	511	50,720	* 44	* 1,267
\$1.5 million < \$2.0 million	8,723	1,268,635	5,989	480,618	5,063	663,929	511	8,532
\$2.0 million < \$3.5 million	9,352	1,551,108	7,043	722,776	5,674	1,286,107	656	26,447
\$3.5 million < \$5.0 million	2,556	546,097	1,975	314,369	1,638	597,552	278	20,441
\$5.0 million < \$10.0 million	2,269	637,462	1,894	469,303	1,344	516,046	185	8,589
\$10.0 million < \$20.0 million	683	318,739	576	312,166	405	189,139	65	3,861
\$20.0 million or more	310	285,974	284	451,210	194	77,068	24	5,455

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1c. Estate Tax Returns Filed in 2006 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Farm assets [3]		Limited partnerships		Other noncorporate business assets		Mortgages and notes	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
All returns	3,558	1,655,794	7,689	5,507,087	5,484	3,210,702	11,028	4,508,657
Under \$1.5 million	135	16,950	211	29,054	95	11,366	484	87,150
\$1.5 million < \$2.0 million	1,120	250,123	1,418	219,720	897	155,234	2,527	363,094
\$2.0 million < \$3.5 million	1,258	405,717	2,643	531,807	2,037	352,168	3,733	799,928
\$3.5 million < \$5.0 million	399	166,947	1,063	307,660	845	262,138	1,502	441,108
\$5.0 million < \$10.0 million	392	266,189	1,333	824,218	843	355,881	1,516	689,004
\$10.0 million < \$20.0 million	156	181,900	584	946,932	413	364,618	757	725,359
\$20.0 million or more	99	367,969	436	2,647,697	354	1,709,298	510	1,403,014
All taxable returns	1,442	778,027	3,632	3,383,286	2,073	1,659,876	5,294	2,492,009
Under \$1.5 million	* 40	* 1,446	156	18,915	* 18	* 5,006	293	43,874
\$1.5 million < \$2.0 million	360	62,782	592	97,532	195	31,076	984	153,817
\$2.0 million < \$3.5 million	490	144,272	1,161	255,866	709	114,256	1,658	379,901
\$3.5 million < \$5.0 million	214	75,266	502	157,318	361	115,537	756	231,782
\$5.0 million < \$10.0 million	187	141,707	619	388,151	373	129,341	820	391,165
\$10.0 million < \$20.0 million	87	86,222	320	530,882	196	142,288	440	390,234
\$20.0 million or more	64	266,332	282	1,934,621	221	1,122,374	344	901,236
All nontaxable returns	2,116	877,767	4,057	2,123,802	3,411	1,550,825	5,735	2,016,648
Under \$1.5 million	95	15,503	* 55	* 10,138	76	6,360	191	43,276
\$1.5 million < \$2.0 million	760	187,341	826	122,189	702	124,158	1,544	209,277
\$2.0 million < \$3.5 million	767	261,445	1,483	275,941	1,328	237,912	2,075	420,027
\$3.5 million < \$5.0 million	185	91,681	561	150,342	483	146,601	746	209,327
\$5.0 million < \$10.0 million	205	124,482	714	436,067	470	226,540	696	297,840
\$10.0 million < \$20.0 million	69	95,678	264	416,050	217	222,330	317	335,125
\$20.0 million or more	35	101,637	155	713,075	133	586,924	166	501,778

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1c. Estate Tax Returns Filed in 2006 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Retirement assets		Depletables/intangibles		Art		Other assets	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
All returns	30,233	15,259,137	3,305	810,863	3,293	1,439,132	42,564	2,366,579
Under \$1.5 million	1,019	208,732	102	15,441	61	3,462	1,636	51,535
\$1.5 million < \$2.0 million	8,953	2,688,025	804	92,337	481	19,482	12,554	310,066
\$2.0 million < \$3.5 million	12,112	5,407,618	1,110	134,869	982	54,148	16,282	550,105
\$3.5 million < \$5.0 million	3,628	2,334,409	460	96,481	445	33,257	4,968	289,795
\$5.0 million < \$10.0 million	3,019	2,570,978	491	218,298	653	99,971	4,630	371,856
\$10.0 million < \$20.0 million	987	1,145,906	199	108,164	337	150,403	1,588	267,443
\$20.0 million or more	515	903,467	138	145,273	334	1,078,410	907	525,779
All taxable returns	12,126	5,671,419	1,723	439,149	1,888	641,151	19,872	1,260,093
Under \$1.5 million	393	106,421	* 39	* 10,692	**	**	683	22,079
\$1.5 million < \$2.0 million	3,021	868,578	361	51,543	** 183	** 5,000	4,729	100,658
\$2.0 million < \$3.5 million	5,021	1,985,317	564	72,234	564	21,995	7,808	202,764
\$3.5 million < \$5.0 million	1,585	879,541	248	47,600	261	21,756	2,612	126,587
\$5.0 million < \$10.0 million	1,296	913,562	289	121,817	389	48,304	2,492	198,479
\$10.0 million < \$20.0 million	504	473,080	122	34,378	239	88,331	949	181,152
\$20.0 million or more	305	444,920	100	100,885	252	455,764	598	428,373
All nontaxable returns	18,107	9,587,717	1,582	371,714	1,404	797,981	22,693	1,106,486
Under \$1.5 million	626	102,311	64	4,749	**	**	953	29,455
\$1.5 million < \$2.0 million	5,932	1,819,447	443	40,794	** 359	** 17,944	7,825	209,408
\$2.0 million < \$3.5 million	7,090	3,422,302	545	62,635	418	32,153	8,474	347,341
\$3.5 million < \$5.0 million	2,043	1,454,868	212	48,880	184	11,500	2,356	163,208
\$5.0 million < \$10.0 million	1,723	1,657,416	202	96,481	264	51,667	2,137	173,377
\$10.0 million < \$20.0 million	483	672,827	77	73,786	98	62,072	638	86,291
\$20.0 million or more	210	458,547	38	44,388	82	622,645	309	97,406

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1c. Estate Tax Returns Filed in 2006 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of deductions							
	Funeral expenses		Executors' commissions		Attorneys' fees		Other expenses/losses	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(49)	(50)	(51)	(52)	(53)	(54)	(55)	(56)
All returns	42,858	415,140	16,701	1,265,158	30,003	1,047,600	30,482	1,241,842
Under \$1.5 million	1,797	14,231	695	21,659	1,291	30,234	1,296	23,236
\$1.5 million < \$2.0 million	12,977	107,335	4,617	152,667	9,124	159,917	9,229	122,404
\$2.0 million < \$3.5 million	16,264	145,779	6,325	313,387	11,229	296,286	11,542	235,880
\$3.5 million < \$5.0 million	5,006	52,153	2,016	156,628	3,465	129,435	3,440	114,161
\$5.0 million < \$10.0 million	4,435	54,427	1,940	226,352	3,109	166,730	3,190	186,754
\$10.0 million < \$20.0 million	1,517	21,369	684	148,482	1,128	111,562	1,133	127,430
\$20.0 million or more	863	19,847	423	245,983	658	153,436	653	431,977
All taxable returns	21,776	201,056	13,518	1,098,702	19,920	804,368	19,723	1,096,563
Under \$1.5 million	796	6,117	386	11,191	738	14,457	646	13,498
\$1.5 million < \$2.0 million	5,450	39,610	3,027	101,788	4,924	86,897	4,847	62,348
\$2.0 million < \$3.5 million	8,618	73,381	5,595	279,973	7,986	229,019	7,932	208,061
\$3.5 million < \$5.0 million	2,810	27,234	1,822	143,007	2,583	107,351	2,558	103,718
\$5.0 million < \$10.0 million	2,551	29,747	1,718	207,064	2,308	137,065	2,359	168,526
\$10.0 million < \$20.0 million	966	12,983	594	134,713	869	95,100	866	118,447
\$20.0 million or more	585	11,982	376	220,966	512	134,480	513	421,965
All nontaxable returns	21,082	214,085	3,182	166,455	10,083	243,232	10,759	145,279
Under \$1.5 million	1,000	8,114	309	10,468	553	15,777	650	9,738
\$1.5 million < \$2.0 million	7,528	67,725	1,590	50,880	4,200	73,020	4,382	60,057
\$2.0 million < \$3.5 million	7,646	72,397	730	33,414	3,242	67,267	3,610	27,819
\$3.5 million < \$5.0 million	2,196	24,918	194	13,621	881	22,084	881	10,443
\$5.0 million < \$10.0 million	1,884	24,680	222	19,287	801	29,665	831	18,228
\$10.0 million < \$20.0 million	551	8,386	90	13,768	260	16,462	267	8,983
\$20.0 million or more	278	7,864	48	25,017	146	18,956	139	10,012

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1c. Estate Tax Returns Filed in 2006 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of deductions—continued							
	Debts and mortgages		Bequests to surviving spouse		Charitable deduction		Allowable deductions	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(57)	(58)	(59)	(60)	(61)	(62)	(63)	(64)
All returns	35,873	7,909,327	21,867	65,831,439	9,522	17,590,332	49,019	95,504,013
Under \$1.5 million	1,560	150,175	630	299,884	349	62,958	2,000	608,645
\$1.5 million < \$2.0 million	10,181	749,439	5,475	3,874,210	2,255	741,966	14,846	5,944,072
\$2.0 million < \$3.5 million	13,598	1,974,352	8,941	11,692,957	3,571	2,161,734	18,848	16,887,449
\$3.5 million < \$5.0 million	4,305	952,780	2,851	7,035,186	1,144	1,058,407	5,629	9,523,515
\$5.0 million < \$10.0 million	3,994	1,155,150	2,604	12,299,737	1,259	2,067,036	5,049	16,186,391
\$10.0 million < \$20.0 million	1,416	915,866	855	8,837,751	538	1,793,409	1,708	11,969,438
\$20.0 million or more	818	2,011,565	510	21,791,714	406	9,704,822	939	34,384,503
All taxable returns	19,793	3,964,023	1,946	10,921,253	5,331	10,431,999	22,777	28,679,871
Under \$1.5 million	701	30,591	**	**	155	6,838	819	86,504
\$1.5 million < \$2.0 million	4,636	144,211	** 153	** 26,139	820	49,468	5,694	532,638
\$2.0 million < \$3.5 million	7,841	723,442	545	301,602	2,070	429,779	9,035	2,299,093
\$3.5 million < \$5.0 million	2,634	477,554	400	503,664	742	291,163	2,951	1,673,649
\$5.0 million < \$10.0 million	2,460	612,413	411	1,104,200	839	777,019	2,660	3,064,610
\$10.0 million < \$20.0 million	941	589,061	217	1,448,084	383	874,981	1,004	3,284,731
\$20.0 million or more	580	1,386,751	220	7,537,564	322	8,002,751	614	17,738,646
All nontaxable returns	16,080	3,945,304	19,921	54,910,186	4,191	7,158,333	26,242	66,824,142
Under \$1.5 million	859	119,584	**	**	194	56,120	1,181	522,141
\$1.5 million < \$2.0 million	5,545	605,228	** 5,952	** 4,147,954	1,435	692,498	9,152	5,411,434
\$2.0 million < \$3.5 million	5,757	1,250,910	8,397	11,391,355	1,501	1,731,955	9,813	14,588,356
\$3.5 million < \$5.0 million	1,672	475,225	2,452	6,531,522	401	767,243	2,678	7,849,865
\$5.0 million < \$10.0 million	1,534	542,737	2,193	11,195,536	421	1,290,018	2,390	13,121,782
\$10.0 million < \$20.0 million	475	326,805	638	7,389,667	155	918,427	704	8,684,707
\$20.0 million or more	238	624,814	290	14,254,151	84	1,702,071	324	16,645,857

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1c. Estate Tax Returns Filed in 2006 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of deductions—continued		Taxable estate [5]		Adjusted taxable gifts		Adjusted taxable estate	
	State death tax deduction [4]							
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(65)	(66)	(67)	(68)	(69)	(70)	(71)	(72)
All returns	12,254	2,770,955	46,887	113,551,860	10,997	7,666,568	46,988	121,218,428
Under \$1.5 million	283	12,887	1,904	1,772,410	1,007	655,824	1,925	2,428,233
\$1.5 million < \$2.0 million	3,395	246,175	14,098	19,447,223	1,838	571,632	14,110	20,018,855
\$2.0 million < \$3.5 million	4,779	535,216	17,999	31,472,304	3,005	1,105,496	18,018	32,577,801
\$3.5 million < \$5.0 million	1,529	294,497	5,435	13,468,923	1,525	783,597	5,452	14,252,520
\$5.0 million < \$10.0 million	1,384	469,696	4,875	17,494,771	1,964	1,385,355	4,887	18,880,126
\$10.0 million < \$20.0 million	562	416,241	1,662	10,630,323	992	1,157,501	1,672	11,787,824
\$20.0 million or more	323	796,244	914	19,265,905	666	2,007,162	924	21,273,068
All taxable returns	8,702	2,542,518	22,798	84,871,630	6,635	5,818,775	22,798	90,690,405
Under \$1.5 million	167	6,492	819	890,341	540	405,722	819	1,296,063
\$1.5 million < \$2.0 million	1,913	133,343	5,704	9,438,355	936	395,115	5,704	9,833,470
\$2.0 million < \$3.5 million	3,626	467,606	9,042	20,722,394	1,810	764,879	9,043	21,487,273
\$3.5 million < \$5.0 million	1,221	277,402	2,951	10,308,993	960	581,998	2,951	10,890,991
\$5.0 million < \$10.0 million	1,070	453,563	2,663	14,706,175	1,239	1,044,581	2,664	15,750,755
\$10.0 million < \$20.0 million	429	409,666	1,004	9,868,164	681	935,943	1,004	10,804,108
\$20.0 million or more	277	794,446	614	18,937,209	469	1,690,536	614	20,627,745
All nontaxable returns	3,552	228,437	24,090	28,680,230	4,362	1,847,793	24,190	30,528,022
Under \$1.5 million	116	6,395	1,085	882,067	468	250,102	1,106	1,132,170
\$1.5 million < \$2.0 million	1,482	112,832	8,394	10,008,868	902	176,517	8,406	10,185,385
\$2.0 million < \$3.5 million	1,153	67,610	8,956	10,749,911	1,195	340,617	8,975	11,090,528
\$3.5 million < \$5.0 million	308	17,095	2,484	3,159,930	564	201,599	2,501	3,361,529
\$5.0 million < \$10.0 million	314	16,133	2,212	2,788,598	725	340,774	2,224	3,129,371
\$10.0 million < \$20.0 million	132	6,575	658	762,159	310	221,557	668	983,717
\$20.0 million or more	46	1,798	300	328,696	197	316,627	310	645,323

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1c. Estate Tax Returns Filed in 2006 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Tentative estate tax		Gift tax		Total tax before credits		Allowable unified credit	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(73)	(74)	(75)	(76)	(77)	(78)	(79)	(80)
All returns	46,976	50,274,393	2,406	1,447,084	46,956	48,828,095	49,041	27,424,139
Under \$1.5 million	1,925	895,350	236	48,092	1,917	847,258	2,009	852,346
\$1.5 million < \$2.0 million	14,100	7,444,594	252	25,223	14,100	7,419,372	14,849	8,176,477
\$2.0 million < \$3.5 million	18,018	12,724,676	372	51,211	18,012	12,673,481	18,855	10,780,284
\$3.5 million < \$5.0 million	5,451	5,890,728	289	70,955	5,449	5,819,773	5,628	3,228,197
\$5.0 million < \$10.0 million	4,886	8,148,795	527	220,580	4,885	7,928,356	5,053	2,887,632
\$10.0 million < \$20.0 million	1,672	5,293,448	378	269,991	1,668	5,024,086	1,708	969,709
\$20.0 million or more	924	9,876,802	352	761,033	924	9,115,769	939	529,494
All taxable returns	22,798	39,086,018	1,728	1,232,898	22,798	37,853,120	22,798	12,810,791
Under \$1.5 million	819	491,020	151	23,084	819	467,936	819	370,414
\$1.5 million < \$2.0 million	5,704	3,748,452	128	18,945	5,704	3,729,508	5,704	3,165,131
\$2.0 million < \$3.5 million	9,043	8,668,862	257	40,159	9,043	8,628,703	9,043	5,143,795
\$3.5 million < \$5.0 million	2,951	4,650,958	226	54,611	2,951	4,596,347	2,951	1,691,717
\$5.0 million < \$10.0 million	2,664	6,986,129	398	191,136	2,664	6,794,993	2,664	1,519,731
\$10.0 million < \$20.0 million	1,004	4,924,098	289	241,210	1,004	4,682,888	1,004	572,350
\$20.0 million or more	614	9,616,500	279	663,754	614	8,952,745	614	347,653
All nontaxable returns	24,178	11,188,375	678	214,186	24,158	10,974,975	26,243	14,613,348
Under \$1.5 million	1,106	404,330	85	25,008	1,098	379,322	1,190	481,932
\$1.5 million < \$2.0 million	8,396	3,696,142	124	6,278	8,396	3,689,864	9,146	5,011,347
\$2.0 million < \$3.5 million	8,975	4,055,814	115	11,052	8,969	4,044,778	9,812	5,636,489
\$3.5 million < \$5.0 million	2,500	1,239,770	63	16,344	2,498	1,223,426	2,677	1,536,479
\$5.0 million < \$10.0 million	2,223	1,162,666	129	29,445	2,222	1,133,363	2,390	1,367,901
\$10.0 million < \$20.0 million	668	369,350	89	28,781	664	341,198	704	397,359
\$20.0 million or more	310	260,302	73	97,278	310	163,024	324	181,841

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1c. Estate Tax Returns Filed in 2006 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	State death tax credit [6]		Other tax credits		Net estate tax		Generation skipping tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(81)	(82)	(83)	(84)	(85)	(86)	(87)	(88)
All returns	3,274	261,535	528	159,036	22,798	24,652,654	267	100,067
Under \$1.5 million	326	8,180	0	0	819	89,709	0	0
\$1.5 million < \$2.0 million	869	16,312	82	3,947	5,704	546,210	* 28	* 1,468
\$2.0 million < \$3.5 million	1,069	38,272	189	21,262	9,043	3,426,895	82	8,825
\$3.5 million < \$5.0 million	355	20,534	81	17,010	2,951	2,867,297	43	5,867
\$5.0 million < \$10.0 million	382	44,576	112	35,762	2,664	5,201,526	36	9,698
\$10.0 million < \$20.0 million	155	39,663	40	34,607	1,004	4,045,908	37	18,519
\$20.0 million or more	116	93,999	24	46,448	614	8,475,110	39	55,689
All taxable returns	2,974	258,200	493	131,474	22,798	24,652,654	d	d
Under \$1.5 million	300	7,813	d	d	819	89,709	d	d
\$1.5 million < \$2.0 million	657	14,294	d	d	5,704	546,210	d	d
\$2.0 million < \$3.5 million	1,055	38,136	d	d	9,043	3,426,895	d	d
\$3.5 million < \$5.0 million	334	20,323	d	d	2,951	2,867,297	d	d
\$5.0 million < \$10.0 million	373	44,399	d	d	2,664	5,201,526	d	d
\$10.0 million < \$20.0 million	145	39,269	d	d	1,004	4,045,908	d	d
\$20.0 million or more	109	93,966	d	d	614	8,475,110	d	d
All nontaxable returns	300	3,335	35	27,562	0	0	d	d
Under \$1.5 million	* 26	* 366	d	d	0	0	d	d
\$1.5 million < \$2.0 million	212	2,018	d	d	0	0	d	d
\$2.0 million < \$3.5 million	* 15	* 137	d	d	0	0	d	d
\$3.5 million < \$5.0 million	* 22	* 211	d	d	0	0	d	d
\$5.0 million < \$10.0 million	* 9	* 177	d	d	0	0	d	d
\$10.0 million < \$20.0 million	10	394	d	d	0	0	d	d
\$20.0 million or more	* 7	* 32	d	d	0	0	d	d

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 1c. Estate Tax Returns Filed in 2006 [1], by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Community property		Total mutual funds		Total joint property		Total lifetime transfers		Qualified terminable interest property	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(89)	(90)	(91)	(92)	(93)	(94)	(95)	(96)	(97)	(98)
All returns	6,022	41,157,259	41,623	22,133,858	23,352	11,000,136	21,313	70,301,032	9,470	29,986,143
Under \$1.5 million	191	391,427	1,607	282,249	706	144,095	804	637,492	192	67,595
\$1.5 million < \$2.0 million	1,517	4,530,432	12,120	3,226,574	6,606	1,711,198	5,692	6,794,959	1,621	605,949
\$2.0 million < \$3.5 million	2,599	10,959,436	15,985	6,008,592	9,426	3,479,192	7,898	13,779,905	3,696	2,946,450
\$3.5 million < \$5.0 million	717	4,769,239	4,879	2,583,865	2,816	1,517,891	2,652	6,780,711	1,454	2,413,501
\$5.0 million < \$10.0 million	687	7,448,303	4,599	3,800,600	2,535	1,974,360	2,697	11,687,429	1,581	5,423,920
\$10.0 million < \$20.0 million	197	4,057,075	1,550	2,367,792	805	1,119,561	958	7,939,977	544	4,296,746
\$20.0 million or more	114	9,001,347	881	3,864,187	458	1,053,841	612	22,680,559	382	14,231,983
All taxable returns	403	3,739,163	19,972	13,162,135	7,242	2,619,657	10,385	42,384,328	813	6,298,253
Under \$1.5 million	0	0	712	130,035	213	28,806	361	248,586	0	0
\$1.5 million < \$2.0 million	* 62	* 142,291	4,866	1,430,923	1,700	411,922	2,241	2,840,179	0	0
\$2.0 million < \$3.5 million	133	482,837	7,815	3,354,454	2,910	856,397	3,820	6,897,758	143	85,357
\$3.5 million < \$5.0 million	68	254,881	2,604	1,586,129	956	280,998	1,455	3,883,440	167	202,911
\$5.0 million < \$10.0 million	69	515,410	2,468	2,353,511	898	412,334	1,479	6,511,774	211	477,189
\$10.0 million < \$20.0 million	34	521,338	925	1,532,646	332	252,679	598	4,822,763	135	725,288
\$20.0 million or more	36	1,822,405	583	2,774,438	234	376,520	431	17,179,828	157	4,807,508
All nontaxable returns	5,618	37,418,096	21,650	8,971,724	16,110	8,380,479	10,928	27,916,704	8,658	23,687,890
Under \$1.5 million	191	391,427	896	152,214	493	115,289	443	388,906	192	67,595
\$1.5 million < \$2.0 million	1,454	4,388,141	7,254	1,795,651	4,906	1,299,276	3,451	3,954,780	1,621	605,949
\$2.0 million < \$3.5 million	2,466	10,476,599	8,171	2,654,138	6,516	2,622,795	4,078	6,882,147	3,553	2,861,092
\$3.5 million < \$5.0 million	649	4,514,358	2,275	997,736	1,861	1,236,893	1,196	2,897,271	1,287	2,210,590
\$5.0 million < \$10.0 million	618	6,932,892	2,131	1,447,089	1,637	1,562,025	1,219	5,175,655	1,370	4,946,732
\$10.0 million < \$20.0 million	163	3,535,737	625	835,146	473	866,881	361	3,117,215	409	3,571,458
\$20.0 million or more	78	7,178,942	298	1,089,750	223	677,320	181	5,500,731	225	9,424,475

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

** Data were combined to prevent disclosure of individual taxpayer data.

d—Data were deleted to prevent disclosure of individual taxpayer data. However, the data are included in the appropriate totals.

[1] The majority of estates file Federal estate tax returns in the year after a decedent's death. So, in 2006, most returns were filed for deaths that occurred in 2005, for which the filing threshold was \$1.5 million. Because of filing extensions, however, some returns were filed in 2006 for deaths that occurred prior to 2005. In 2006, the estate tax filing threshold increased to \$2.0 million.

[2] Gross estate is shown at the value used to determine estate tax liability. Gross estate could be reported as of date of death or 6 months thereafter (i.e., alternate valuation method).

[3] The "Farm assets" category does not include farmland. Farmland was included in the "Other real estate" category.

[4] Available only for estates in which the decedent died in 2005 or later.

[5] The definition of taxable estate differs for the estates of decedents who died before 2005 due to the replacement of the state death tax credit with the state death tax deduction. The state death tax credit was taken to reduce gross estate tax and was therefore not used to calculate taxable estate. In contrast, the state death tax deduction is subtracted from tentative taxable estate to compute the taxable estate.

[6] Available only for estates in which the decedent died prior to 2005.

NOTE: Detail may not add to total due to rounding.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 2. Estate Tax Returns Filed for 2004 Decedents, Values for Tax Purposes, by Tax Status and Size of Gross Estate

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

Tax status and size of gross estate	Gross estate for tax purposes [1]		Type of property					
			Personal residence		Other real estate [2]		Real estate partnerships	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All returns	42,239	185,921,379	28,321	15,857,140	26,564	24,061,573	2,885	3,146,464
\$1.5 million < \$2.0 million	14,818	25,487,122	9,612	3,838,278	8,440	4,048,242	556	148,785
\$2.0 million < \$3.5 million	16,022	41,255,953	10,797	5,103,875	10,161	6,374,936	972	335,908
\$3.5 million < \$5.0 million	4,756	19,668,543	3,262	1,962,331	3,080	2,816,440	381	237,671
\$5.0 million < \$10.0 million	4,384	29,661,196	3,019	2,392,482	3,118	4,249,480	507	560,215
\$10.0 million < \$20.0 million	1,458	19,962,325	1,031	1,236,690	1,112	2,674,065	262	500,803
\$20.0 million or more	801	49,886,242	600	1,323,485	654	3,898,410	207	1,363,083
All taxable returns	19,294	102,077,964	12,128	7,522,521	11,471	10,919,313	1,130	1,215,221
\$1.5 million < \$2.0 million	5,340	9,470,301	3,236	1,360,430	2,715	1,286,012	198	76,425
\$2.0 million < \$3.5 million	7,772	20,215,207	4,858	2,423,860	4,685	2,782,803	343	137,474
\$3.5 million < \$5.0 million	2,440	10,068,953	1,501	841,152	1,422	1,238,907	129	103,020
\$5.0 million < \$10.0 million	2,376	16,261,970	1,582	1,296,975	1,615	1,979,510	224	179,526
\$10.0 million < \$20.0 million	856	11,743,784	571	726,477	629	1,307,097	119	175,126
\$20.0 million or more	510	34,317,749	379	873,627	404	2,324,983	117	543,650
All nontaxable returns	22,945	83,843,415	16,192	8,334,620	15,094	13,142,260	1,755	1,931,243
\$1.5 million < \$2.0 million	9,478	16,016,821	6,376	2,477,848	5,725	2,762,230	358	72,360
\$2.0 million < \$3.5 million	8,250	21,040,745	5,939	2,680,015	5,476	3,592,133	628	198,434
\$3.5 million < \$5.0 million	2,316	9,599,590	1,760	1,121,180	1,658	1,577,533	253	134,651
\$5.0 million < \$10.0 million	2,008	13,399,226	1,437	1,095,507	1,503	2,269,970	283	380,689
\$10.0 million < \$20.0 million	603	8,218,541	459	510,213	483	1,366,968	143	325,677
\$20.0 million or more	290	15,568,493	221	449,858	250	1,573,427	90	819,433

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 2. Estate Tax Returns Filed for 2004 Decedents, Values for Tax Purposes, by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Closely held stock		Publicly traded stock		State and local bonds		Federal savings bonds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All returns	6,686	12,647,000	34,942	51,504,154	23,273	18,334,701	4,963	414,742
\$1.5 million < \$2.0 million	1,269	420,750	11,661	5,301,281	7,262	2,134,259	1,713	128,405
\$2.0 million < \$3.5 million	2,262	1,106,609	13,277	9,711,818	8,679	3,615,964	2,242	175,064
\$3.5 million < \$5.0 million	1,108	952,068	4,126	5,055,150	2,880	1,996,493	499	55,668
\$5.0 million < \$10.0 million	1,123	1,488,311	3,840	8,280,134	2,882	3,572,842	370	44,288
\$10.0 million < \$20.0 million	533	1,448,861	1,305	5,715,292	993	2,380,675	96	8,746
\$20.0 million or more	390	7,230,401	733	17,440,479	577	4,634,467	43	2,570
All taxable returns	2,537	5,934,743	16,447	34,269,354	11,753	11,795,863	2,413	247,891
\$1.5 million < \$2.0 million	311	82,745	4,242	2,293,478	2,742	933,080	627	55,824
\$2.0 million < \$3.5 million	786	418,142	6,626	5,414,408	4,662	2,071,448	1,174	124,726
\$3.5 million < \$5.0 million	426	301,988	2,192	3,146,349	1,625	1,236,325	301	41,022
\$5.0 million < \$10.0 million	518	649,225	2,121	5,276,156	1,674	2,216,395	224	18,839
\$10.0 million < \$20.0 million	274	645,091	783	3,984,772	642	1,604,505	58	5,609
\$20.0 million or more	222	3,837,553	483	14,154,191	407	3,734,110	29	1,871
All nontaxable returns	4,149	6,712,256	18,495	17,234,800	11,520	6,538,838	2,550	166,851
\$1.5 million < \$2.0 million	958	338,005	7,419	3,007,803	4,520	1,201,179	1,086	72,581
\$2.0 million < \$3.5 million	1,476	688,467	6,651	4,297,411	4,017	1,544,517	1,067	50,338
\$3.5 million < \$5.0 million	682	650,080	1,934	1,908,801	1,255	760,167	199	14,646
\$5.0 million < \$10.0 million	605	839,086	1,719	3,003,977	1,208	1,356,447	146	25,450
\$10.0 million < \$20.0 million	259	803,771	522	1,730,521	351	776,170	39	3,137
\$20.0 million or more	168	3,392,848	250	3,286,287	169	900,357	13	699

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 2. Estate Tax Returns Filed for 2004 Decedents, Values for Tax Purposes, by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Other Federal bonds		Corporate and foreign bonds		Bond funds		Unclassifiable mutual funds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
All returns	11,155	4,154,808	13,248	2,542,599	3,868	351,109	7,934	1,003,814
\$1.5 million < \$2.0 million	3,563	624,076	4,383	403,001	1,342	63,878	2,849	211,936
\$2.0 million < \$3.5 million	4,381	806,535	5,065	626,232	1,529	111,203	3,055	293,339
\$3.5 million < \$5.0 million	1,291	443,164	1,561	224,793	392	53,399	824	112,188
\$5.0 million < \$10.0 million	1,205	553,576	1,433	365,968	421	50,948	817	137,820
\$10.0 million < \$20.0 million	427	495,267	506	249,345	117	37,968	243	96,386
\$20.0 million or more	288	1,232,190	300	673,260	67	33,714	145	152,146
All taxable returns	5,886	2,599,853	6,646	1,503,640	1,859	229,241	3,370	519,632
\$1.5 million < \$2.0 million	1,623	324,167	1,613	165,407	479	20,548	902	83,804
\$2.0 million < \$3.5 million	2,359	496,767	2,746	379,070	801	77,727	1,403	175,220
\$3.5 million < \$5.0 million	717	271,173	924	155,806	230	38,688	411	55,911
\$5.0 million < \$10.0 million	714	358,500	826	200,831	233	38,413	412	69,546
\$10.0 million < \$20.0 million	274	296,808	331	172,832	69	26,769	146	52,604
\$20.0 million or more	199	852,439	206	429,694	46	27,096	97	82,546
All nontaxable returns	5,269	1,554,955	6,602	1,038,959	2,009	121,868	4,564	484,182
\$1.5 million < \$2.0 million	1,940	299,909	2,770	237,595	863	43,330	1,948	128,132
\$2.0 million < \$3.5 million	2,022	309,768	2,319	247,162	728	33,475	1,652	118,119
\$3.5 million < \$5.0 million	574	171,992	637	68,987	162	14,711	413	56,276
\$5.0 million < \$10.0 million	491	195,076	607	165,137	188	12,535	405	68,274
\$10.0 million < \$20.0 million	153	198,460	176	76,513	48	11,199	97	43,782
\$20.0 million or more	89	379,751	94	243,566	20	6,618	48	69,599

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 2. Estate Tax Returns Filed for 2004 Decedents, Values for Tax Purposes, by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Cash		Cash management accounts		Insurance, face value		Insurance, policy loans	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
All returns	40,662	10,657,933	31,249	6,841,164	21,073	4,034,307	2,223	91,971
\$1.5 million < \$2.0 million	14,307	2,507,156	10,193	882,572	7,299	836,415	684	7,829
\$2.0 million < \$3.5 million	15,287	3,001,728	11,911	1,682,380	8,252	1,546,250	816	37,505
\$3.5 million < \$5.0 million	4,600	1,248,097	3,684	745,691	2,310	592,280	298	16,795
\$5.0 million < \$10.0 million	4,254	1,565,164	3,540	1,192,022	2,159	617,413	272	15,205
\$10.0 million < \$20.0 million	1,424	903,186	1,231	808,861	672	249,369	98	8,942
\$20.0 million or more	790	1,432,601	689	1,529,638	381	192,580	55	5,696
All taxable returns	18,780	6,456,883	14,775	4,176,821	7,858	971,465	763	31,525
\$1.5 million < \$2.0 million	5,193	1,169,672	3,745	405,847	1,986	137,781	237	2,197
\$2.0 million < \$3.5 million	7,501	1,838,559	5,949	951,574	3,367	344,436	223	9,110
\$3.5 million < \$5.0 million	2,386	813,487	1,924	411,067	923	140,763	94	2,750
\$5.0 million < \$10.0 million	2,345	937,856	1,969	750,531	1,008	191,466	127	8,679
\$10.0 million < \$20.0 million	846	612,057	738	529,247	350	82,757	49	6,205
\$20.0 million or more	510	1,085,251	450	1,128,555	225	74,262	33	2,584
All nontaxable returns	21,882	4,201,050	16,474	2,664,343	13,215	3,062,842	1,460	60,446
\$1.5 million < \$2.0 million	9,114	1,337,484	6,448	476,725	5,313	698,634	447	5,631
\$2.0 million < \$3.5 million	7,787	1,163,169	5,962	730,807	4,885	1,201,813	594	28,395
\$3.5 million < \$5.0 million	2,214	434,611	1,760	334,624	1,387	451,517	204	14,045
\$5.0 million < \$10.0 million	1,910	627,308	1,571	441,491	1,152	425,948	145	6,525
\$10.0 million < \$20.0 million	578	291,129	493	279,613	322	166,612	50	2,737
\$20.0 million or more	279	347,350	240	401,082	156	118,318	21	3,112

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 2. Estate Tax Returns Filed for 2004 Decedents, Values for Tax Purposes, by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Farm assets [2]		Limited partnerships		Other noncorporate business assets		Mortgages and notes	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
All returns	2,710	1,305,910	6,368	4,852,973	4,824	2,995,577	9,687	3,919,863
\$1.5 million < \$2.0 million	963	173,518	1,241	142,855	1,045	179,075	2,652	361,663
\$2.0 million < \$3.5 million	935	267,384	2,287	525,582	1,703	308,877	3,177	630,052
\$3.5 million < \$5.0 million	297	161,755	876	280,847	598	159,266	1,312	485,267
\$5.0 million < \$10.0 million	296	147,944	1,134	731,876	814	357,012	1,473	729,356
\$10.0 million < \$20.0 million	123	168,348	478	743,751	357	304,439	660	619,320
\$20.0 million or more	96	386,960	352	2,428,061	308	1,686,909	414	1,094,205
All taxable returns	1,053	601,962	3,013	2,954,560	1,747	793,766	4,441	2,075,506
\$1.5 million < \$2.0 million	222	48,950	436	42,797	271	26,108	917	121,485
\$2.0 million < \$3.5 million	414	67,390	1,067	274,683	558	105,267	1,444	259,971
\$3.5 million < \$5.0 million	131	68,332	424	121,796	208	52,080	619	247,985
\$5.0 million < \$10.0 million	154	72,247	587	381,110	355	127,322	804	397,521
\$10.0 million < \$20.0 million	72	98,415	273	388,343	167	128,578	379	318,310
\$20.0 million or more	61	246,627	226	1,745,831	188	354,411	278	730,234
All nontaxable returns	1,657	703,949	3,355	1,898,413	3,077	2,201,811	5,246	1,844,357
\$1.5 million < \$2.0 million	742	124,568	805	100,058	775	152,967	1,735	240,178
\$2.0 million < \$3.5 million	521	199,994	1,220	250,900	1,144	203,610	1,733	370,082
\$3.5 million < \$5.0 million	166	93,423	452	159,051	389	107,186	693	237,282
\$5.0 million < \$10.0 million	142	75,697	547	350,766	459	229,690	669	331,835
\$10.0 million < \$20.0 million	51	69,933	205	355,408	190	175,861	280	301,010
\$20.0 million or more	36	140,333	125	682,230	120	1,332,498	137	363,971

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 2. Estate Tax Returns Filed for 2004 Decedents, Values for Tax Purposes, by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Retirement assets		Depletables/intangibles		Art		Other assets	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
All returns	25,205	12,597,616	2,711	577,217	2,847	1,666,672	36,964	2,376,114
\$1.5 million < \$2.0 million	8,688	2,693,530	814	38,608	566	11,622	12,723	347,368
\$2.0 million < \$3.5 million	9,841	4,385,508	949	90,555	745	17,786	13,806	510,923
\$3.5 million < \$5.0 million	2,867	1,711,059	297	57,886	352	30,539	4,267	293,319
\$5.0 million < \$10.0 million	2,559	2,084,202	396	148,542	582	72,355	4,035	314,356
\$10.0 million < \$20.0 million	808	891,615	142	94,137	304	117,415	1,364	217,505
\$20.0 million or more	443	831,702	113	147,489	298	1,416,956	768	692,643
All taxable returns	9,582	4,519,966	1,387	336,635	1,626	991,858	16,819	1,349,192
\$1.5 million < \$2.0 million	2,517	733,553	356	6,748	201	2,580	4,471	98,703
\$2.0 million < \$3.5 million	4,028	1,572,376	497	48,113	428	9,152	6,633	214,214
\$3.5 million < \$5.0 million	1,221	598,439	139	14,719	181	13,429	2,193	150,227
\$5.0 million < \$10.0 million	1,174	810,332	227	100,923	382	37,785	2,218	166,984
\$10.0 million < \$20.0 million	399	350,498	96	42,560	210	65,035	802	128,081
\$20.0 million or more	243	454,769	72	123,572	223	863,877	502	590,982
All nontaxable returns	15,623	8,077,650	1,324	240,582	1,220	674,814	20,145	1,026,922
\$1.5 million < \$2.0 million	6,171	1,959,978	458	31,860	365	9,042	8,252	248,664
\$2.0 million < \$3.5 million	5,813	2,813,132	452	42,442	317	8,634	7,173	296,709
\$3.5 million < \$5.0 million	1,646	1,112,620	158	43,167	171	17,110	2,074	143,092
\$5.0 million < \$10.0 million	1,385	1,273,871	169	47,620	200	34,570	1,818	147,372
\$10.0 million < \$20.0 million	409	541,116	46	51,577	93	52,380	562	89,423
\$20.0 million or more	200	376,933	41	23,916	74	553,079	266	101,661

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 3. Estate Tax Returns Filed for 2004 Decedents, Date of Death Values, by Tax Status and Size of Gross Estate

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

Tax status and size of gross estate	Total gross estate, date of death		Type of property					
			Personal residence		Other real estate [1]		Real estate partnerships	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All returns	42,239	186,487,888	28,326	15,867,456	26,564	24,096,857	2,885	3,146,438
\$1.5 million < \$2.0 million	14,818	25,520,296	9,612	3,838,156	8,440	4,048,716	556	148,789
\$2.0 million < \$3.5 million	16,022	41,362,000	10,797	5,112,052	10,161	6,377,540	972	335,908
\$3.5 million < \$5.0 million	4,756	19,738,439	3,267	1,965,766	3,080	2,817,194	381	237,682
\$5.0 million < \$10.0 million	4,384	29,730,396	3,019	2,391,164	3,118	4,251,395	507	560,253
\$10.0 million < \$20.0 million	1,458	20,015,224	1,031	1,237,067	1,112	2,674,400	262	500,790
\$20.0 million or more	801	50,121,534	600	1,323,250	654	3,927,612	207	1,363,016
All taxable returns	19,294	102,619,071	12,134	7,532,566	11,471	10,953,209	1,130	1,215,195
\$1.5 million < \$2.0 million	5,340	9,497,443	3,236	1,360,166	2,715	1,286,419	198	76,429
\$2.0 million < \$3.5 million	7,772	20,305,740	4,858	2,431,910	4,685	2,784,243	343	137,474
\$3.5 million < \$5.0 million	2,440	10,135,965	1,507	844,587	1,422	1,239,528	129	103,032
\$5.0 million < \$10.0 million	2,376	16,330,506	1,582	1,295,657	1,615	1,981,426	224	179,563
\$10.0 million < \$20.0 million	856	11,796,377	571	726,854	629	1,307,407	119	175,113
\$20.0 million or more	510	34,553,041	379	873,392	404	2,354,185	117	543,583
All nontaxable returns	22,945	83,868,817	16,192	8,334,890	15,094	13,143,649	1,755	1,931,243
\$1.5 million < \$2.0 million	9,478	16,022,853	6,376	2,477,991	5,725	2,762,297	358	72,360
\$2.0 million < \$3.5 million	8,250	21,056,260	5,939	2,680,142	5,476	3,593,297	628	198,434
\$3.5 million < \$5.0 million	2,316	9,602,474	1,760	1,121,180	1,658	1,577,666	253	134,651
\$5.0 million < \$10.0 million	2,008	13,399,890	1,437	1,095,507	1,503	2,269,970	283	380,689
\$10.0 million < \$20.0 million	603	8,218,847	459	510,213	483	1,366,992	143	325,677
\$20.0 million or more	290	15,568,493	221	449,858	250	1,573,427	90	819,433

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 3. Estate Tax Returns Filed for 2004 Decedents, Date of Death Values, by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Closely held stock		Publicly traded stock		State and local bonds		Federal savings bonds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All returns	6,688	12,677,450	34,942	51,887,217	23,268	18,393,855	4,963	414,652
\$1.5 million < \$2.0 million	1,269	422,056	11,661	5,322,349	7,262	2,137,821	1,713	128,405
\$2.0 million < \$3.5 million	2,263	1,107,542	13,277	9,779,425	8,679	3,628,437	2,242	174,988
\$3.5 million < \$5.0 million	1,108	954,464	4,126	5,093,303	2,875	2,003,452	499	55,660
\$5.0 million < \$10.0 million	1,123	1,489,475	3,840	8,328,279	2,882	3,583,512	370	44,286
\$10.0 million < \$20.0 million	533	1,452,041	1,305	5,753,933	994	2,391,639	96	8,742
\$20.0 million or more	390	7,251,873	733	17,609,929	577	4,648,995	43	2,570
All taxable returns	2,537	5,963,221	16,447	34,634,266	11,748	11,854,347	2,413	247,800
\$1.5 million < \$2.0 million	311	84,070	4,242	2,310,560	2,742	936,396	627	55,824
\$2.0 million < \$3.5 million	786	418,979	6,626	5,468,604	4,662	2,083,667	1,174	124,649
\$3.5 million < \$5.0 million	426	302,488	2,192	3,183,928	1,620	1,243,225	301	41,014
\$5.0 million < \$10.0 million	518	650,389	2,121	5,324,305	1,674	2,227,044	224	18,837
\$10.0 million < \$20.0 million	274	648,270	783	4,023,228	643	1,615,379	58	5,605
\$20.0 million or more	222	3,859,025	483	14,323,641	407	3,748,638	29	1,871
All nontaxable returns	4,150	6,714,229	18,495	17,252,951	11,520	6,539,508	2,550	166,852
\$1.5 million < \$2.0 million	958	337,985	7,419	3,011,789	4,520	1,201,425	1,086	72,581
\$2.0 million < \$3.5 million	1,478	688,563	6,651	4,310,821	4,017	1,544,770	1,067	50,339
\$3.5 million < \$5.0 million	682	651,976	1,934	1,909,375	1,255	760,228	199	14,646
\$5.0 million < \$10.0 million	605	839,086	1,719	3,003,974	1,208	1,356,468	146	25,450
\$10.0 million < \$20.0 million	259	803,771	522	1,730,705	351	776,260	39	3,137
\$20.0 million or more	168	3,392,848	250	3,286,287	169	900,357	13	699

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 3. Estate Tax Returns Filed for 2004 Decedents, Date of Death Values, by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Other Federal bonds		Corporate and foreign bonds		Bond funds		Unclassifiable mutual funds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
All returns	11,155	4,162,876	13,247	2,549,494	3,868	352,760	7,934	1,005,427
\$1.5 million < \$2.0 million	3,563	626,402	4,383	403,722	1,342	64,534	2,849	212,255
\$2.0 million < \$3.5 million	4,381	808,614	5,063	628,492	1,529	111,926	3,055	294,214
\$3.5 million < \$5.0 million	1,291	444,101	1,561	226,421	392	53,531	824	112,568
\$5.0 million < \$10.0 million	1,205	554,534	1,433	366,978	421	51,035	817	137,819
\$10.0 million < \$20.0 million	427	496,039	506	249,859	117	37,989	243	96,440
\$20.0 million or more	288	1,233,187	300	674,022	67	33,746	145	152,130
All taxable returns	5,886	2,607,434	6,644	1,509,804	1,859	230,866	3,370	520,976
\$1.5 million < \$2.0 million	1,623	326,081	1,613	165,674	479	21,192	902	83,879
\$2.0 million < \$3.5 million	2,359	498,780	2,745	381,109	801	78,440	1,403	176,076
\$3.5 million < \$5.0 million	717	272,102	924	157,377	230	38,816	411	56,286
\$5.0 million < \$10.0 million	714	359,458	826	201,842	233	38,500	412	69,546
\$10.0 million < \$20.0 million	274	297,578	331	173,346	69	26,790	146	52,659
\$20.0 million or more	199	853,436	206	430,456	46	27,128	97	82,531
All nontaxable returns	5,269	1,555,442	6,602	1,039,691	2,009	121,895	4,564	484,451
\$1.5 million < \$2.0 million	1,940	300,321	2,770	238,048	863	43,342	1,948	128,376
\$2.0 million < \$3.5 million	2,022	309,834	2,319	247,383	728	33,486	1,652	118,139
\$3.5 million < \$5.0 million	574	171,999	637	69,044	162	14,715	413	56,282
\$5.0 million < \$10.0 million	491	195,076	607	165,137	188	12,535	405	68,274
\$10.0 million < \$20.0 million	153	198,461	176	76,513	48	11,199	97	43,782
\$20.0 million or more	89	379,751	94	243,566	20	6,618	48	69,599

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 3. Estate Tax Returns Filed for 2004 Decedents, Date of Death Values, by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Cash		Cash management accounts		Insurance, face value		Insurance, policy loans	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
All returns	40,662	10,685,727	31,246	6,839,844	21,073	4,034,440	2,223	92,091
\$1.5 million < \$2.0 million	14,307	2,508,081	10,193	882,601	7,299	836,427	684	7,829
\$2.0 million < \$3.5 million	15,287	3,002,662	11,911	1,682,620	8,252	1,546,250	816	37,505
\$3.5 million < \$5.0 million	4,600	1,270,090	3,684	745,745	2,310	592,280	298	16,795
\$5.0 million < \$10.0 million	4,254	1,566,816	3,538	1,192,342	2,159	617,414	272	15,205
\$10.0 million < \$20.0 million	1,424	903,459	1,231	804,741	672	249,369	98	8,942
\$20.0 million or more	790	1,434,621	689	1,531,796	381	192,700	55	5,816
All taxable returns	18,780	6,484,130	14,772	4,175,458	7,858	971,586	763	31,645
\$1.5 million < \$2.0 million	5,193	1,170,565	3,745	405,835	1,986	137,781	237	2,197
\$2.0 million < \$3.5 million	7,501	1,839,493	5,949	951,812	3,367	344,436	223	9,110
\$3.5 million < \$5.0 million	2,386	835,483	1,924	411,121	923	140,763	94	2,750
\$5.0 million < \$10.0 million	2,345	938,989	1,966	750,851	1,008	191,467	127	8,679
\$10.0 million < \$20.0 million	846	612,329	738	525,126	350	82,757	49	6,205
\$20.0 million or more	510	1,087,271	450	1,130,714	225	74,382	33	2,704
All nontaxable returns	21,882	4,201,597	16,474	2,664,385	13,215	3,062,854	1,460	60,446
\$1.5 million < \$2.0 million	9,114	1,337,516	6,448	476,766	5,313	698,646	447	5,631
\$2.0 million < \$3.5 million	7,787	1,163,169	5,962	730,807	4,885	1,201,813	594	28,395
\$3.5 million < \$5.0 million	2,214	434,606	1,760	334,624	1,387	451,517	204	14,045
\$5.0 million < \$10.0 million	1,910	627,826	1,571	441,491	1,152	425,948	145	6,525
\$10.0 million < \$20.0 million	578	291,129	493	279,615	322	166,612	50	2,737
\$20.0 million or more	279	347,350	240	401,082	156	118,318	21	3,112

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 3. Estate Tax Returns Filed for 2004 Decedents, Date of Death Values, by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Farm assets [1]		Limited partnerships		Other noncorporate business assets		Mortgages and notes	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
All returns	2,710	1,285,358	6,369	4,854,580	4,823	3,000,700	9,688	3,910,369
\$1.5 million < \$2.0 million	963	173,519	1,241	142,921	1,045	179,075	2,652	361,663
\$2.0 million < \$3.5 million	935	267,384	2,288	525,801	1,703	308,954	3,177	630,069
\$3.5 million < \$5.0 million	297	161,709	876	282,254	597	159,454	1,312	475,151
\$5.0 million < \$10.0 million	296	147,945	1,134	733,789	814	356,988	1,474	729,663
\$10.0 million < \$20.0 million	123	168,666	478	743,756	357	305,205	660	619,910
\$20.0 million or more	96	366,136	352	2,426,060	308	1,691,026	414	1,093,915
All taxable returns	1,053	581,408	3,013	2,956,001	1,746	798,889	4,442	2,066,010
\$1.5 million < \$2.0 million	222	48,950	436	42,858	271	26,108	917	121,485
\$2.0 million < \$3.5 million	414	67,390	1,067	274,860	558	105,343	1,444	259,987
\$3.5 million < \$5.0 million	131	68,285	424	123,203	207	52,268	619	237,866
\$5.0 million < \$10.0 million	154	72,248	587	382,908	355	127,298	805	397,828
\$10.0 million < \$20.0 million	72	98,732	273	388,343	167	129,344	379	318,900
\$20.0 million or more	61	225,803	226	1,743,829	188	358,527	278	729,944
All nontaxable returns	1,657	703,949	3,356	1,898,579	3,077	2,201,811	5,246	1,844,360
\$1.5 million < \$2.0 million	742	124,569	805	100,062	775	152,967	1,735	240,178
\$2.0 million < \$3.5 million	521	199,994	1,221	250,941	1,144	203,610	1,733	370,082
\$3.5 million < \$5.0 million	166	93,423	452	159,051	389	107,186	693	237,285
\$5.0 million < \$10.0 million	142	75,697	547	350,882	459	229,690	669	331,835
\$10.0 million < \$20.0 million	51	69,933	205	355,413	190	175,861	280	301,010
\$20.0 million or more	36	140,333	125	682,230	120	1,332,498	137	363,971

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 3. Estate Tax Returns Filed for 2004 Decedents, Date of Death Values, by Tax Status and Size of Gross Estate—Continued

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

Tax status and size of gross estate	Type of property—continued							
	Retirement assets		Depletables/intangibles		Art		Other assets	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
All returns	25,205	12,609,546	2,711	586,382	2,847	1,666,672	36,968	2,381,783
\$1.5 million < \$2.0 million	8,688	2,695,354	814	38,608	566	11,622	12,723	347,374
\$2.0 million < \$3.5 million	9,841	4,391,447	949	90,555	745	17,786	13,808	511,861
\$3.5 million < \$5.0 million	2,867	1,712,411	297	57,886	352	30,539	4,267	293,443
\$5.0 million < \$10.0 million	2,559	2,086,507	396	148,542	582	72,355	4,038	314,414
\$10.0 million < \$20.0 million	808	891,814	142	94,137	304	117,415	1,364	217,534
\$20.0 million or more	443	832,013	113	156,654	298	1,416,956	768	697,156
All taxable returns	9,582	4,531,263	1,387	345,800	1,626	991,858	16,823	1,354,834
\$1.5 million < \$2.0 million	2,517	734,980	356	6,748	201	2,580	4,471	98,709
\$2.0 million < \$3.5 million	4,028	1,578,205	497	48,113	428	9,152	6,634	215,163
\$3.5 million < \$5.0 million	1,221	599,679	139	14,719	181	13,429	2,193	150,314
\$5.0 million < \$10.0 million	1,174	812,622	227	100,923	382	37,785	2,220	167,042
\$10.0 million < \$20.0 million	399	350,698	96	42,560	210	65,035	802	128,111
\$20.0 million or more	243	455,079	72	132,738	223	863,877	502	595,495
All nontaxable returns	15,623	8,078,283	1,324	240,582	1,220	674,814	20,145	1,026,948
\$1.5 million < \$2.0 million	6,171	1,960,374	458	31,860	365	9,042	8,252	248,666
\$2.0 million < \$3.5 million	5,813	2,813,242	452	42,442	317	8,634	7,173	296,698
\$3.5 million < \$5.0 million	1,646	1,112,732	158	43,167	171	17,110	2,074	143,129
\$5.0 million < \$10.0 million	1,385	1,273,885	169	47,620	200	34,570	1,818	147,372
\$10.0 million < \$20.0 million	409	541,116	46	51,577	93	52,380	562	89,423
\$20.0 million or more	200	376,933	41	23,916	74	553,079	266	101,661

[1] The "Farm assets" category does not include farmland. Farmland was included in the "Other real estate" category.

NOTE: Detail may not add to total due to rounding.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 4. Estate Tax Returns Filed for 2004 Decedents Making Charitable Bequests, and Recipients of Charitable Bequests, by Sex and Marital Status of Decedent

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

Sex, marital status	Net worth [1]		Gross charitable bequests		Type of recipient	
					Arts, culture, and humanities	
	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
All decedents	8,722	58,111,245	8,722	17,827,014	1,054	501,923
Married	1,705	17,410,602	1,705	4,914,811	183	74,709
Widow or widower	5,116	32,620,786	5,116	9,807,829	616	227,057
Single	1,293	5,129,377	1,293	2,220,674	155	160,871
Other [2]	609	2,950,481	609	883,700	100	39,286
Female decedents	4,886	28,351,949	4,886	10,124,383	637	265,486
Married	273	4,487,856	273	2,918,102	23	11,382
Widow	3,610	20,240,304	3,610	5,878,866	465	158,105
Single	623	2,136,329	623	921,540	78	73,612
Other [2]	380	1,487,459	380	405,876	71	22,387
Male decedents	3,836	29,759,297	3,836	7,702,630	416	236,437
Married	1,433	12,922,745	1,433	1,996,710	160	63,327
Widower	1,505	12,380,482	1,505	3,928,963	150	68,952
Single	670	2,993,048	670	1,299,134	77	87,259
Other [2]	228	1,463,021	228	477,824	* 29	* 16,899

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 4. Estate Tax Returns Filed for 2004 Decedents Making Charitable Bequests, and Recipients of Charitable Bequests, by Sex and Marital Status of Decedent—Continued

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

Sex, marital status	Type of recipient—continued					
	Education		Environmental and animals		Health	
	Number	Amount	Number	Amount	Number	Amount
	(7)	(8)	(9)	(10)	(11)	(12)
All decedents	3,725	2,605,507	990	436,976	2,493	1,111,900
Married	754	307,751	111	32,655	305	75,188
Widow or widower	2,182	1,679,089	572	220,396	1,593	765,139
Single	550	455,286	205	154,703	404	191,924
Other [2]	238	163,381	103	29,222	192	79,649
Female decedents	2,020	1,585,996	669	285,595	1,567	780,145
Married	101	38,291	21	1,863	85	21,666
Widow	1,504	1,260,414	477	186,868	1,180	624,221
Single	265	205,018	94	75,438	178	85,088
Other [2]	150	82,273	78	21,425	124	49,170
Male decedents	1,705	1,019,510	321	151,381	927	331,755
Married	654	269,460	90	30,791	221	53,522
Widower	678	418,674	95	33,528	412	140,918
Single	286	250,268	111	79,265	226	106,836
Other [2]	88	81,108	25	7,797	68	30,478

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 4. Estate Tax Returns Filed for 2004 Decedents Making Charitable Bequests, and Recipients of Charitable Bequests, by Sex and Marital Status of Decedent—Continued

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

Sex, marital status	Type of recipient—continued					
	Human services		International, foreign affairs		Public societal benefit	
	Number	Amount	Number	Amount	Number	Amount
	(13)	(14)	(15)	(16)	(17)	(18)
All decedents	2,644	937,378	140	11,907	2,301	10,465,123
Married	381	95,936	* 10	* 481	476	4,096,082
Widow or widower	1,652	600,302	105	9,969	1,406	5,216,901
Single	481	177,945	* 12	* 838	300	719,024
Other [2]	129	63,194	* 13	* 619	120	433,117
Female decedents	1,613	610,194	113	10,195	1,253	5,528,476
Married	62	25,333	d	d	71	2,788,419
Widow	1,221	449,286	d	d	971	2,346,134
Single	230	89,944	d	d	157	244,284
Other [2]	99	45,631	d	d	54	149,638
Male decedents	1,031	327,184	26	1,712	1,048	4,936,647
Married	319	70,603	d	d	405	1,307,662
Widower	431	151,016	d	d	435	2,870,766
Single	251	88,001	d	d	143	474,740
Other [2]	30	17,564	d	d	65	283,479

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 4. Estate Tax Returns Filed for 2004 Decedents Making Charitable Bequests, and Recipients of Charitable Bequests, by Sex and Marital Status of Decedent—Continued

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

Sex, marital status	Type of recipient—continued					
	Religion related		Mutual, membership benefit		Unknown	
	Number	Amount	Number	Amount	Number	Amount
	(19)	(20)	(21)	(22)	(23)	(24)
All decedents	4,247	1,085,648	199	30,909	1,066	639,744
Married	675	88,358	* 13	* 1,916	232	141,735
Widow or widower	2,630	704,829	152	22,373	628	361,776
Single	754	253,771	* 33	* 6,619	153	99,693
Other [2]	188	38,691	0	0	53	36,541
Female decedents	2,584	707,877	125	14,066	567	336,354
Married	109	9,095	d	d	32	20,362
Widow	1,955	548,136	d	d	390	284,148
Single	383	118,038	d	d	110	29,254
Other [2]	138	32,607	0	0	36	2,591
Male decedents	1,663	377,771	73	16,843	499	303,390
Married	566	79,263	d	d	200	121,372
Widower	675	156,692	d	d	239	77,628
Single	371	135,732	d	d	43	70,439
Other [2]	51	6,083	0	0	* 17	* 33,951

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

d—Data were deleted to prevent disclosure of individual taxpayer data. However, the data are included in the appropriate totals.

[1] Net worth is calculated as "total gross estate for tax purposes" less "debts and mortgages." Negative values of net worth were constrained to zero.

[2] "Other" category includes divorced, legally separated, or marital status unknown.

NOTE: Detail may not add to total due to rounding.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 5a. Estate Tax Returns Filed in 2004 [1], by State of Residence

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

State of residence	Gross estate, tax purposes [2]		Total allowable deductions		State death tax credit		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Total	65,039	194,450,432	64,981	87,450,666	34,026	3,178,664	31,329	21,611,909
Alabama	695	1,845,996	695	873,395	277	22,662	299	172,686
Alaska	96	172,233	96	74,338	* 62	* 2,139	* 40	* 12,506
Arizona	1,262	3,326,163	1,262	1,416,077	684	51,274	619	351,649
Arkansas	276	1,383,116	276	818,351	168	20,373	168	135,284
California	11,808	33,321,579	11,799	13,929,658	6,181	530,570	5,787	3,672,336
Colorado	648	2,161,032	648	1,175,612	278	29,230	271	179,045
Connecticut	1,311	4,195,953	1,311	1,745,254	700	84,393	670	585,356
Delaware	339	732,406	339	197,164	189	12,445	174	88,129
District of Columbia	245	834,799	245	332,863	131	17,478	131	123,151
Florida	5,670	18,186,817	5,670	7,551,317	3,139	354,802	3,006	2,477,167
Georgia	1,336	4,530,465	1,336	2,307,844	659	65,977	615	475,994
Hawaii	293	773,108	293	426,448	54	6,666	58	45,178
Idaho	207	459,342	207	182,049	115	6,003	93	39,943
Illinois	2,830	8,313,337	2,830	3,568,443	1,522	123,445	1,438	955,557
Indiana	871	2,478,448	853	1,086,847	463	38,842	414	289,765
Iowa	779	1,572,956	779	584,749	284	16,271	263	133,569
Kansas	580	1,407,434	580	638,534	206	17,945	189	121,877
Kentucky	404	1,358,457	404	502,074	216	27,445	231	215,513
Louisiana	401	1,099,165	401	492,647	202	20,855	91	126,746
Maine	240	635,791	240	256,016	128	10,145	124	80,061
Maryland	1,323	4,209,487	1,323	1,774,883	743	85,920	662	556,324
Massachusetts	2,249	6,382,749	2,249	3,069,372	1,122	88,800	1,050	605,415
Michigan	1,751	4,710,643	1,749	1,891,740	928	78,272	844	530,949
Minnesota	1,181	2,670,566	1,181	1,236,578	617	31,243	518	199,007
Mississippi	265	796,729	265	295,893	118	15,858	119	122,890
Missouri	1,061	3,110,697	1,061	1,266,538	583	52,653	511	383,935
Montana	264	512,584	264	204,821	81	4,755	81	36,292
Nebraska	420	1,165,239	420	522,331	238	17,416	200	119,900
Nevada	455	2,594,308	455	1,613,788	199	38,227	242	225,968
New Hampshire	280	982,669	280	292,706	169	28,003	168	181,475
New Jersey	2,413	6,447,645	2,413	2,966,781	1,342	92,393	1,121	600,531
New Mexico	220	689,873	218	361,848	121	7,997	100	57,593
New York	5,120	20,178,184	5,117	10,571,900	2,727	374,147	2,591	2,255,586
North Carolina	1,648	4,040,274	1,648	1,512,799	895	68,895	869	473,459
North Dakota	88	210,110	88	101,319	* 53	* 1,796	* 31	* 11,446
Ohio	2,074	6,002,983	2,074	2,815,809	1,177	90,098	992	638,330
Oklahoma	602	2,102,060	602	806,007	326	54,608	262	316,194
Oregon	779	1,795,186	758	611,915	479	31,873	430	216,739
Pennsylvania	2,781	8,733,552	2,781	4,419,434	1,623	131,433	1,270	822,526
Rhode Island	165	590,612	165	223,142	118	13,366	107	93,294
South Carolina	727	1,941,444	727	823,917	307	29,858	294	216,637
South Dakota	211	437,855	211	156,704	60	8,253	60	49,381
Tennessee	986	2,528,473	986	1,087,776	403	44,333	357	284,746
Texas	3,035	9,376,445	3,033	4,627,967	1,503	130,206	1,455	915,020
Utah	221	668,657	221	354,712	94	8,861	94	60,370
Vermont	117	282,475	117	126,164	* 18	* 4,797	* 10	* 27,064
Virginia	1,571	4,632,504	1,571	1,791,470	858	87,543	767	594,217
Washington	1,188	3,867,294	1,188	2,072,374	593	51,619	514	354,842
West Virginia	216	579,857	216	269,254	103	6,019	103	45,463
Wisconsin	1,011	2,513,193	1,011	1,054,019	690	35,054	623	239,887
Wyoming	126	315,481	126	174,035	* 62	* 2,779	* 62	* 15,937
Other areas [3]	201	592,006	201	192,989	* 16	* 2,628	* 141	* 78,982

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

[1] The majority of estates file Federal estate tax returns in the year after a decedent's death. So, in 2004, most returns were filed for deaths that occurred in 2003, for which the filing threshold was \$1.0 million. Because of filing extensions, however, some returns were filed for deaths that occurred prior to 2002, for which the filing thresholds were lower.

For deaths that occurred in 2004, the filing threshold was \$1.5 million.

[2] Gross estate is shown at the value used to determine estate tax liability. The value could be determined as of the decedent's date of death or 6 months thereafter (i.e., alternate valuation method).

[3] Includes U.S. territories, U.S. citizens domiciled abroad, and a small number of returns for whom State of residence was unknown.

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

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 5b. Estate Tax Returns Filed in 2005 [1], by State of Residence

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

State of residence	Gross estate, tax purposes [2]		Total allowable deductions		State death tax credit [3]		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Total	45,070	184,696,403	45,020	84,963,478	20,156	1,861,784	20,250	21,671,503
Alabama	409	1,550,182	409	749,705	191	11,909	198	169,405
Alaska	54	141,119	54	91,008	* 4	* 263	* 4	* 3,701
Arizona	615	2,174,613	615	822,011	267	24,371	261	289,201
Arkansas	310	1,028,468	310	370,309	122	11,403	95	127,415
California	9,016	35,645,136	8,992	15,815,333	3,911	361,382	4,044	4,018,694
Colorado	601	1,821,250	601	890,303	228	11,664	240	132,160
Connecticut	848	3,666,847	848	1,514,285	326	41,581	352	545,981
Delaware	176	547,881	176	180,884	116	4,878	121	61,000
District of Columbia	186	681,793	186	336,896	89	5,662	85	71,997
Florida	4,053	20,139,320	4,052	9,641,158	1,729	232,993	1,801	2,597,208
Georgia	961	3,872,379	961	2,008,204	343	34,384	352	402,037
Hawaii	210	719,214	210	307,967	98	8,049	118	89,266
Idaho	78	456,966	78	254,234	48	3,622	34	47,732
Illinois	2,176	8,106,912	2,176	3,533,882	1,033	72,252	1,122	920,509
Indiana	631	2,622,577	631	1,258,854	295	24,259	294	288,907
Iowa	532	1,549,025	532	643,290	180	10,415	174	155,263
Kansas	414	1,279,138	414	508,619	185	9,477	207	114,773
Kentucky	441	1,255,583	441	439,543	174	11,700	186	143,531
Louisiana	314	1,277,408	314	597,216	174	12,052	141	148,771
Maine	216	722,600	216	320,344	83	6,601	88	91,952
Maryland	1,113	3,891,537	1,113	1,603,610	574	38,977	548	454,826
Massachusetts	1,461	4,978,371	1,461	1,949,879	704	58,335	706	619,647
Michigan	1,050	8,517,068	1,050	4,654,584	400	104,360	401	1,184,771
Minnesota	584	3,289,925	584	1,543,827	210	42,896	203	507,095
Mississippi	195	868,631	195	482,361	79	6,045	89	76,882
Missouri	717	2,761,650	717	1,085,032	326	29,540	336	397,500
Montana	153	337,832	153	130,143	* 61	* 1,382	61	10,269
Nebraska	218	3,712,444	218	2,918,888	147	19,339	153	232,996
Nevada	348	1,449,490	348	615,437	175	15,152	191	204,605
New Hampshire	225	680,806	225	214,228	114	7,803	114	82,980
New Jersey	1,618	5,648,831	1,618	2,538,462	798	50,233	780	576,791
New Mexico	241	586,562	241	187,341	114	4,665	128	59,298
New York	3,580	16,691,033	3,579	7,504,101	1,850	216,129	1,720	2,318,155
North Carolina	925	3,440,706	925	1,545,196	393	26,385	355	362,118
North Dakota	85	294,367	85	161,747	* 26	* 1,454	* 35	* 17,985
Ohio	1,326	4,942,103	1,326	2,388,074	553	35,356	497	443,430
Oklahoma	372	1,211,233	372	467,059	162	12,241	173	157,427
Oregon	383	1,300,879	383	619,193	181	10,179	192	130,298
Pennsylvania	1,568	5,847,003	1,563	2,753,735	839	54,297	716	626,441
Rhode Island	199	751,819	199	429,596	83	3,974	77	50,477
South Carolina	446	1,667,647	446	892,513	159	8,005	165	130,979
South Dakota	120	562,923	120	403,893	* 19	* 755	* 31	* 13,530
Tennessee	563	1,927,497	563	837,589	227	17,597	209	220,761
Texas	1,966	8,546,127	1,962	3,901,681	986	92,919	1,012	1,078,028
Utah	130	547,170	130	198,627	50	5,532	53	84,946
Vermont	120	545,373	120	273,506	32	6,439	33	63,666
Virginia	1,192	3,711,598	1,192	1,423,249	532	32,410	547	406,797
Washington	901	2,948,399	886	1,186,449	359	34,858	336	362,903
West Virginia	152	467,985	152	189,555	66	3,790	70	51,485
Wisconsin	689	2,601,505	689	1,355,392	296	19,124	284	237,245
Wyoming	75	230,694	75	80,020	30	1,812	32	28,062
Other areas [4]	114	478,783	114	144,463	* 15	* 881	87	59,610

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

[1] The majority of estates file Federal estate tax returns in the year after a decedent's death. So, in 2005, most returns were filed for deaths that occurred in 2004, for which the filing threshold was \$1.5 million. Because of filing extensions, however, some returns were filed in 2005 for deaths that occurred prior to 2004, for which the filing thresholds were lower in 2005, the estate tax filing threshold was also \$1.5 million.

[2] Gross estate is shown at the value used to determine estate tax liability. The value could be determined as of the decedent's date of death or 6 months thereafter (i.e., alternate valuation method).

[3] For deaths that occurred in 2005, as well as in later years, a state death tax deduction replaces the state death tax credit.

For filing year 2005, there were 696 estates that used the state death tax deduction, which totaled \$121.0 million.

[4] Includes U.S. territories, U.S. citizens domiciled abroad, and a small number of returns for whom State of residence was unknown.

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

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Table 5c. Estate Tax Returns Filed in 2006 [1], by Selected State of Residence

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

State of residence	Gross estate, tax purposes [2]		Total allowable deductions		State death tax deduction [3]		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Total	49,050	211,460,077	49,019	95,504,013	12,254	2,770,955	22,798	24,652,654
Alabama	491	1,982,641	491	785,285	d	d	219	289,956
Arizona	713	2,770,916	704	1,061,690	23	2,623	371	379,059
Arkansas	277	1,356,285	277	497,634	* 14	* 40	142	232,881
California	9,346	36,198,175	9,340	14,829,933	107	6,173	4,492	4,167,952
Colorado	541	2,991,316	541	1,755,489	d	d	210	263,027
Connecticut	1,021	4,851,388	1,021	2,225,951	218	153,480	399	573,409
Delaware	145	696,796	145	251,261	* 14	* 255	83	126,998
District of Columbia	149	838,787	149	513,711	53	21,453	44	76,237
Florida	4,957	23,359,883	4,957	10,227,566	319	21,761	2,482	3,323,539
Georgia	1,071	4,288,178	1,071	2,133,889	* 32	* 1,666	429	394,095
Hawaii	247	894,328	247	363,401	d	d	131	103,545
Idaho	106	352,286	106	170,046	0	0	48	24,855
Illinois	2,225	9,264,061	2,225	3,994,414	988	245,984	1,120	975,185
Indiana	682	2,333,191	682	991,720	395	57,655	270	232,815
Iowa	514	1,591,945	514	605,343	125	18,408	237	156,979
Kansas	492	1,576,266	492	649,998	242	46,451	191	146,476
Kentucky	387	1,239,230	387	534,381	63	4,163	160	126,911
Louisiana	485	2,299,190	485	1,280,512	d	d	198	196,615
Maine	240	1,089,465	240	372,151	145	64,642	116	181,621
Maryland	1,210	4,539,161	1,203	2,044,205	635	125,899	542	449,966
Massachusetts	1,396	5,245,552	1,396	2,326,702	663	154,077	606	531,110
Michigan	1,163	5,292,589	1,163	2,239,858	* 5	* 1,317	551	734,383
Minnesota	636	2,416,803	636	1,233,129	343	60,539	230	178,467
Mississippi	179	827,150	179	312,342	d	d	106	136,845
Missouri	752	3,068,382	752	1,341,365	* 11	* 418	371	372,264
Montana	157	458,079	157	120,848	0	0	92	56,942
Nebraska	198	875,463	198	385,938	119	25,837	62	105,342
Nevada	314	1,431,567	314	622,955	d	d	144	195,791
New Hampshire	224	913,057	224	320,941	* 11	* 256	131	146,481
New Jersey	1,788	6,957,137	1,788	3,363,940	1,006	244,609	739	642,651
New Mexico	153	538,121	153	212,111	* 20	* 1,373	75	66,526
New York	3,608	21,593,377	3,608	12,415,338	2,096	600,509	1,750	2,088,085
North Carolina	1,089	4,261,633	1,082	1,878,271	444	125,117	523	422,148
Ohio	1,644	5,692,404	1,644	2,214,955	1,069	166,143	790	587,469
Oklahoma	400	1,432,495	400	518,891	181	40,755	196	188,882
Oregon	612	2,078,679	612	715,972	324	78,426	290	240,957
Pennsylvania	1,729	7,286,204	1,729	3,437,947	1,080	177,243	732	749,923
Rhode Island	242	820,923	242	414,019	125	25,975	111	75,974
South Carolina	613	1,943,820	612	764,132	* 13	* 126	272	210,037
South Dakota	86	415,713	86	185,104	0	0	46	61,891
Tennessee	557	2,311,109	557	1,162,253	198	46,104	204	210,351
Texas	2,316	9,585,224	2,316	3,999,757	19	2,376	1,082	1,261,715
Utah	181	902,046	181	453,065	d	d	66	110,204
Vermont	69	381,926	69	125,106	39	7,563	47	77,178
Virginia	1,454	5,359,527	1,454	2,269,907	532	138,567	657	558,458
Washington	944	3,680,490	944	1,768,156	162	35,650	472	302,540
West Virginia	252	781,851	252	208,558	d	d	163	106,363
Wisconsin	635	2,263,709	635	1,012,011	375	62,800	232	233,166

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

d—Data were deleted to prevent disclosure of individual taxpayer data. However, the data are included in the appropriate totals.

[1] The majority of estates file Federal estate tax returns in the year after a decedent's death. So, in 2006, most returns were filed for deaths that occurred in 2005, for which the filing threshold was \$1.5 million. Because of filing extensions, however, some returns were filed in 2006 for deaths that occurred prior to 2005.

In 2006, the estate tax filing threshold increased to \$2.0 million.

[2] Gross estate is shown at the value used to determine estate tax liability. The value could be determined as of the decedent's date of death or 6 months thereafter (i.e., alternate valuation method).

[3] For deaths that occurred prior to 2005, a state death tax credit was available instead of a state death tax deduction. For filing year 2006, there were 3,274 estates that used the state death tax credit, which totaled \$261.6 million.

NOTE: Not all states are shown.

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Table 6. Estate Tax Returns Filed for 2004 Decedents, by State of Residence

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

State of residence	Gross estate, tax purposes [1]		Total allowable deductions		State death tax credit		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Total	42,239	185,921,379	42,212	83,991,160	20,430	1,741,606	19,294	22,219,722
Alabama	409	1,582,888	409	674,954	186	13,663	186	192,473
Alaska	31	99,483	31	66,276	* 4	* 266	* 4	* 3,739
Arizona	621	2,408,320	621	950,561	317	23,232	302	311,565
Arkansas	265	974,431	265	372,582	124	10,310	108	117,256
California	8,464	34,208,317	8,462	13,825,131	3,926	323,550	3,782	4,131,248
Colorado	529	1,630,180	529	665,604	248	11,505	232	143,801
Connecticut	783	3,884,353	783	1,651,324	366	47,049	341	598,826
Delaware	223	721,092	223	216,749	151	7,330	136	87,531
District of Columbia	177	838,357	177	426,339	103	6,367	95	83,900
Florida	4,090	20,245,897	4,089	9,417,586	1,914	199,719	1,871	2,635,096
Georgia	900	4,077,616	900	2,141,718	341	30,011	322	405,561
Hawaii	164	677,400	164	336,956	65	4,638	64	61,901
Idaho	109	523,850	109	265,255	55	4,060	40	50,694
Illinois	1,957	8,149,220	1,957	3,601,880	1,007	72,207	999	946,912
Indiana	650	2,831,953	650	1,341,075	330	25,417	311	317,585
Iowa	474	1,425,778	474	544,611	218	12,129	184	158,665
Kansas	460	1,363,923	460	551,698	193	8,861	178	103,960
Kentucky	329	1,130,537	329	393,887	143	11,915	142	146,137
Louisiana	347	2,018,730	347	1,247,191	154	10,148	151	147,549
Maine	168	659,868	168	264,836	78	6,447	75	91,739
Maryland	1,065	4,307,335	1,065	1,892,827	630	39,709	550	482,638
Massachusetts	1,351	5,074,541	1,351	2,098,838	700	47,752	687	604,858
Michigan	951	8,439,720	951	4,510,416	395	105,131	380	1,217,440
Minnesota	575	2,875,632	575	1,143,000	228	42,685	203	489,367
Mississippi	188	803,735	188	298,585	97	9,527	97	126,962
Missouri	809	3,273,612	809	1,330,399	379	32,124	379	431,486
Montana	142	387,347	142	141,102	59	2,249	59	20,450
Nebraska	292	3,864,505	292	2,991,944	153	19,519	153	238,470
Nevada	300	1,523,564	300	695,661	170	15,577	164	211,414
New Hampshire	207	682,735	207	195,856	119	8,686	102	94,771
New Jersey	1,528	5,845,773	1,528	2,689,243	761	46,560	719	583,693
New Mexico	200	581,845	198	188,478	96	4,965	96	68,503
New York	3,156	17,657,621	3,156	8,449,386	1,689	200,636	1,539	2,425,496
North Carolina	970	3,709,205	970	1,562,253	472	30,115	430	409,190
North Dakota	45	233,142	45	154,094	* 18	* 836	* 18	* 12,693
Ohio	1,360	5,276,026	1,360	2,535,188	642	36,158	552	457,293
Oklahoma	320	1,146,682	320	401,001	203	11,671	173	147,687
Oregon	306	1,271,623	306	623,822	176	8,816	156	117,853
Pennsylvania	1,497	6,044,429	1,492	2,980,540	806	49,068	641	618,191
Rhode Island	197	675,120	197	305,409	88	5,154	69	69,145
South Carolina	285	1,429,461	285	787,710	132	8,742	131	126,410
South Dakota	113	559,505	113	420,591	* 21	* 682	* 21	* 8,229
Tennessee	519	1,907,851	519	816,146	243	15,305	228	206,705
Texas	1,708	7,601,993	1,708	3,199,133	851	77,989	833	1,021,141
Utah	136	582,465	136	247,942	43	5,167	43	68,946
Vermont	94	606,845	94	284,921	33	6,598	33	87,589
Virginia	1,149	4,106,031	1,149	1,615,872	497	35,343	507	470,479
Washington	720	2,527,374	706	1,074,614	326	20,176	294	275,636
West Virginia	171	485,637	171	135,665	106	4,694	106	53,936
Wisconsin	592	2,332,999	592	1,082,815	327	19,435	309	248,192
Wyoming	62	220,794	62	85,012	41	1,643	41	23,807
Other areas [2]	81	434,037	79	96,485	* 8	* 72	58	64,917

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

[1] Gross estate is shown at the value used to determine estate tax liability. The value could be determined as of the decedent's date of death or 6 months thereafter (i.e., alternate valuation method).

[2] Includes U.S. territories, U.S. citizens domiciled abroad, and a small number of returns for whom State of residence was unknown.

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

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 7. Estate Tax Returns Filed for 2004 Male Decedents, by Age and Marital Status of Decedent and Size of Gross Estate

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

Marital status, size of gross estate	Total				Age of decedent	
					Under 50 years	
	Gross estate, tax purposes [1]		Net estate tax		Gross estate, tax purposes [1]	
	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
All decedents	23,746	110,300,153	8,127	10,028,365	677	2,616,037
Under \$2.0 million	7,730	13,359,610	2,004	182,886	175	304,420
\$2.0 million or more	16,016	96,940,542	6,123	9,845,479	502	2,311,617
Married decedents	14,903	72,040,080	1,362	2,154,199	449	1,775,814
Under \$2.0 million	4,261	7,400,611	95	7,215	108	187,637
\$2.0 million or more	10,641	64,639,468	1,267	2,146,984	341	1,588,177
Widowed decedents	5,631	26,213,004	4,291	5,802,909	* 8	* 19,939
Under \$2.0 million	2,394	4,094,612	1,273	125,710	d	d
\$2.0 million or more	3,237	22,118,391	3,018	5,677,199	d	d
Single decedents	1,851	6,415,869	1,355	941,017	154	614,797
Under \$2.0 million	713	1,238,076	435	35,135	45	78,177
\$2.0 million or more	1,137	5,177,793	920	905,883	109	536,620
Other [2]	1,362	5,631,200	1,119	1,130,240	65	205,487
Under \$2.0 million	362	626,310	201	14,827	d	d
\$2.0 million or more	1,000	5,004,890	918	1,115,413	d	d

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 7. Estate Tax Returns Filed for 2004 Male Decedents, by Age and Marital Status of Decedent and Size of Gross Estate—Continued

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

Marital status, size of gross estate	Age of decedent—continued					
	Under 50 years—continued		50 under 60 years			
	Net estate tax		Gross estate, tax purposes [1]		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount
	(7)	(8)	(9)	(10)	(11)	(12)
All decedents	175	163,307	1,619	6,723,736	321	249,541
Under \$2.0 million	24	2,089	467	814,067	60	3,720
\$2.0 million or more	151	161,218	1,151	5,909,669	261	245,820
Married decedents	20	13,304	1,238	5,521,702	68	69,388
Under \$2.0 million	d	d	318	556,481	* 5	* 332
\$2.0 million or more	d	d	919	4,965,221	64	69,056
Widowed decedents	* 5	* 1,700	43	116,751	29	15,700
Under \$2.0 million	d	d	23	39,594	* 11	* 475
\$2.0 million or more	d	d	20	77,157	18	15,225
Single decedents	111	124,931	173	492,166	114	67,055
Under \$2.0 million	20	1,588	75	129,255	32	2,100
\$2.0 million or more	91	123,344	97	362,911	81	64,955
Other [2]	39	23,372	165	593,117	110	97,398
Under \$2.0 million	d	d	50	88,737	* 12	* 813
\$2.0 million or more	d	d	115	504,380	98	96,584

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 7. Estate Tax Returns Filed for 2004 Male Decedents, by Age and Marital Status of Decedent and Size of Gross Estate—Continued

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

Marital status, size of gross estate	Age of decedent—continued					
	60 under 70 years				70 under 80 years	
	Gross estate, tax purposes [1]		Net estate tax		Gross estate, tax purposes [1]	
	Number	Amount	Number	Amount	Number	Amount
	(13)	(14)	(15)	(16)	(17)	(18)
All decedents	3,500	16,105,582	723	668,921	6,225	27,904,612
Under \$2.0 million	988	1,708,589	142	12,642	1,813	3,151,252
\$2.0 million or more	2,512	14,396,993	582	656,280	4,412	24,753,360
Married decedents	2,735	13,315,160	147	180,518	4,567	21,812,568
Under \$2.0 million	731	1,266,559	d	d	1,205	2,097,735
\$2.0 million or more	2,004	12,048,601	d	d	3,362	19,714,833
Widowed decedents	149	467,983	100	75,096	853	2,998,050
Under \$2.0 million	53	87,703	d	d	341	584,479
\$2.0 million or more	96	380,280	d	d	511	2,413,571
Single decedents	299	901,624	225	120,200	420	1,371,621
Under \$2.0 million	106	188,910	75	8,552	192	338,027
\$2.0 million or more	192	712,714	149	111,648	228	1,033,594
Other [2]	317	1,420,814	252	293,107	385	1,722,374
Under \$2.0 million	98	165,417	52	3,123	* 75	* 131,011
\$2.0 million or more	219	1,255,397	200	289,985	310	1,591,362

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 7. Estate Tax Returns Filed for 2004 Male Decedents, by Age and Marital Status of Decedent and Size of Gross Estate—Continued

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

Marital status, size of gross estate	Age of decedent—continued					
	70 under 80 years—continued		80 years and over			
	Net estate tax		Gross estate, tax purposes [1]		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount
	(19)	(20)	(21)	(22)	(23)	(24)
All decedents	1,676	1,793,920	11,726	56,950,186	5,232	7,152,677
Under \$2.0 million	312	23,164	4,287	7,381,283	1,467	141,271
\$2.0 million or more	1,364	1,770,756	7,439	49,568,903	3,765	7,011,406
Married decedents	406	588,305	5,914	29,614,836	721	1,302,684
Under \$2.0 million	* 17	* 848	1,900	3,292,200	* 71	* 5,838
\$2.0 million or more	390	587,457	4,015	26,322,636	650	1,296,847
Widowed decedents	630	642,414	4,578	22,610,281	3,527	5,067,998
Under \$2.0 million	134	9,798	1,974	3,379,695	1,116	114,566
\$2.0 million or more	496	632,617	2,604	19,230,586	2,411	4,953,432
Single decedents	303	192,089	805	3,035,661	603	436,742
Under \$2.0 million	* 117	* 10,086	294	503,707	191	12,808
\$2.0 million or more	186	182,003	511	2,531,954	412	423,934
Other [2]	336	371,111	430	1,689,408	381	345,252
Under \$2.0 million	* 44	* 2,432	* 119	* 205,680	* 89	* 8,059
\$2.0 million or more	292	368,679	311	1,483,728	292	337,193

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

d—Data were deleted to prevent disclosure of individual taxpayer data. However, the data are included in the appropriate totals.

[1] Gross estate is shown at the value used to determine estate tax liability. The value could be determined as of the decedent's date of death or 6 months thereafter (i.e., alternate valuation method).

[2] "Other" category includes divorced, legally separated, or marital status unknown.

NOTE: Detail may not add to total due to rounding.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 8. Estate Tax Returns Filed for 2004 Female Decedents, by Age and Marital Status of Decedent and Size of Gross Estate

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

Marital status, size of gross estate	Total				Age of decedent	
					Under 50 years	
	Gross estate, tax purposes [1]		Net estate tax		Gross estate, tax purposes [1]	
	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
All decedents	18,493	75,621,227	11,167	12,191,357	255	851,868
Under \$2.0 million	7,088	12,127,512	3,336	332,597	76	130,087
\$2.0 million or more	11,405	63,493,715	7,831	11,858,760	179	721,781
Married decedents	4,678	20,977,505	490	425,132	160	538,808
Under \$2.0 million	1,725	2,980,740	117	6,207	44	75,777
\$2.0 million or more	2,953	17,996,766	372	418,924	116	463,032
Widowed decedents	11,361	46,686,596	8,995	10,524,653	* 8	* 32,553
Under \$2.0 million	4,307	7,356,976	2,697	287,049	d	d
\$2.0 million or more	7,055	39,329,620	6,297	10,237,604	d	d
Single decedents	1,154	3,547,902	752	443,235	59	167,480
Under \$2.0 million	476	809,754	231	15,593	22	36,910
\$2.0 million or more	679	2,738,148	522	427,642	38	130,570
Other [2]	1,300	4,409,223	930	798,337	28	113,027
Under \$2.0 million	581	980,042	291	23,748	d	d
\$2.0 million or more	719	3,429,181	639	774,589	d	d

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 8. Estate Tax Returns Filed for 2004 Female Decedents, by Age and Marital Status of Decedent and Size of Gross Estate—Continued

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

Marital status, size of gross estate	Age of decedent—continued					
	Under 50 years—continued		50 under 60 years			
	Net estate tax		Gross estate, tax purposes [1]		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount
	(7)	(8)	(9)	(10)	(11)	(12)
All decedents	74	52,994	695	2,411,888	215	168,500
Under \$2.0 million	* 9	* 663	249	434,274	40	2,876
\$2.0 million or more	65	52,331	446	1,977,614	175	165,624
Married decedents	10	11,026	416	1,466,308	29	12,160
Under \$2.0 million	d	d	148	261,158	d	d
\$2.0 million or more	d	d	267	1,205,150	d	d
Widowed decedents	* 6	* 3,056	74	227,374	60	37,544
Under \$2.0 million	d	d	23	40,750	d	d
\$2.0 million or more	d	d	51	186,623	d	d
Single decedents	36	17,682	76	203,547	48	21,939
Under \$2.0 million	* 4	* 403	34	58,136	* 14	* 705
\$2.0 million or more	32	17,279	42	145,411	34	21,234
Other [2]	22	21,230	129	514,659	79	96,857
Under \$2.0 million	d	d	43	74,229	d	d
\$2.0 million or more	d	d	86	440,430	d	d

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 8. Estate Tax Returns Filed for 2004 Female Decedents, by Age and Marital Status of Decedent and Size of Gross Estate—Continued

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

Marital status, size of gross estate	Age of decedent—continued					
	60 under 70 years				70 under 80 years	
	Gross estate, tax purposes [1]		Net estate tax		Gross estate, tax purposes [1]	
	Number	Amount	Number	Amount	Number	Amount
	(13)	(14)	(15)	(16)	(17)	(18)
All decedents	1,588	5,523,897	530	462,698	3,505	15,437,119
Under \$2.0 million	603	1,041,512	122	7,589	1,356	2,318,437
\$2.0 million or more	984	4,482,386	408	455,109	2,149	13,118,682
Married decedents	985	3,389,886	105	35,146	1,476	8,000,715
Under \$2.0 million	349	613,891	* 27	* 2,106	540	926,663
\$2.0 million or more	636	2,775,994	78	33,040	936	7,074,052
Widowed decedents	273	1,107,115	177	254,194	1,612	5,884,746
Under \$2.0 million	118	194,440	30	1,421	642	1,112,613
\$2.0 million or more	155	912,675	147	252,773	970	4,772,133
Single decedents	79	247,134	60	37,143	130	542,698
Under \$2.0 million	22	37,230	* 9	* 580	* 31	* 47,731
\$2.0 million or more	57	209,905	51	36,564	100	494,967
Other [2]	251	779,762	188	136,214	287	1,008,960
Under \$2.0 million	114	195,950	55	3,483	144	231,430
\$2.0 million or more	136	583,812	133	132,732	143	777,530

Footnotes at end of table.

Federal Estate Tax Returns Filed for 2004 Decedents

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Table 8. Estate Tax Returns Filed for 2004 Female Decedents, by Age and Marital Status of Decedent and Size of Gross Estate—Continued

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

Marital status, size of gross estate	Age of decedent—continued					
	70 under 80 years—continued		80 years and over			
	Net estate tax		Gross estate, tax purposes [1]		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount
	(19)	(20)	(21)	(22)	(23)	(24)
All decedents	1,739	1,761,145	12,451	51,396,455	8,608	9,746,020
Under \$2.0 million	503	47,928	4,804	8,203,202	2,662	273,541
\$2.0 million or more	1,236	1,713,217	7,647	43,193,253	5,946	9,472,479
Married decedents	177	185,914	1,641	7,581,788	168	180,886
Under \$2.0 million	* 45	* 2,680	644	1,103,251	* 44	* 1,386
\$2.0 million or more	132	183,234	997	6,478,538	125	179,500
Widowed decedents	1,315	1,266,990	9,393	39,434,808	7,436	8,962,869
Under \$2.0 million	432	42,736	3,521	6,005,442	2,219	241,347
\$2.0 million or more	884	1,224,254	5,873	33,429,366	5,217	8,721,522
Single decedents	79	93,951	810	2,387,043	529	272,519
Under \$2.0 million	d	d	367	629,747	202	13,862
\$2.0 million or more	d	d	442	1,757,296	327	258,656
Other [2]	168	214,289	606	1,992,815	474	329,746
Under \$2.0 million	d	d	272	464,762	197	16,945
\$2.0 million or more	d	d	335	1,528,053	277	312,801

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

d—Data were deleted to prevent disclosure of individual taxpayer data. However, the data are included in the appropriate totals.

[1] Gross estate is shown at the value used to determine estate tax liability. The value could be determined as of the decedent's date of death or 6 months thereafter (i.e., alternate valuation method).

[2] "Other" category includes divorced, legally separated, or marital status unknown.

NOTE: Detail may not add to total due to rounding.

The Development of Taxable REIT Subsidiaries, 2001-2004

by Thornton Matheson

The Real Estate Investment Trust (REIT) Modernization Act, Part II, Subpart A of Public Law 106-170, the “Ticket to Work and Work Incentives Improvement Act,” enacted December 17, 1999, created the taxable REIT subsidiary (TRS) in order to allow REITs to offer a more complete range of services to their tenants without jeopardizing their status as REITs. The REIT Modernization Act (RMA) also contained provisions to prevent potential stripping of taxable corporate revenues from TRSs through excessive leverage by subjecting them to section 163(j) of the Internal Revenue Code. A previous study published in the *Statistics of Income Bulletin* analyzed the first year of TRS elections and tax returns, as mandated by the RMA.¹ The purpose of this study is to follow up on that initial investigation with a description of TRS activity over the period 2001-2004.

This study shows that there was rapid growth in TRS firms, assets, and incomes during 2001-2004. TRSs showed increasing profitability over this period, with total net income rising from negative to positive values. TRSs are highly leveraged as a group, with about 30 percent of firms showing negative equity; loans from stockholders constitute less than 4 percent of total TRS debt in any given year. Despite their generally high leverage, roughly 70 percent of TRSs that have loans from stockholders would qualify for exemption from 163(j) restrictions on related-party interest deductibility under either the debt-to-equity ratio test or the excess interest test. Over 2001-2004, TRSs as a group evolved from net interest payers into net interest recipients.

Background

Created by Congress in 1960, REITs provide a vehicle for investment in real estate. As long as an entity otherwise qualifies as a REIT and distributes at least 90 percent of its income to investors as dividends, those dividends are deducted in computing the REIT's taxable income.² Two income tests ensure that REITs

are used predominantly to invest passively in real estate: (1) at least 95 percent of a REIT's income must be derived from “passive” financial investments, including rents, dividends, interest, and capital gains, as opposed to “active” income from business activities; and (2) at least 75 percent of a REIT's income must be derived from real estate sources, including rents, mortgages, and capital gains on real estate.

REITs are restricted in terms of the kinds of services they can provide their tenants. Specifically, a REIT may provide “customary real estate services” to its tenants, but providing more than a de minimis amount of impermissible services (for example, housekeeping services) at a particular property prevents rents from that property from qualifying as rents under the REIT income tests. REITs argued that the constraints placed on their activities by the “customary services” requirement prevented them from competing effectively with non-REIT real estate firms.

Because REITs were limited in the services that they could provide their tenants directly, before the enactment of the RMA many REITs established third-party subsidiaries (TPSs) to provide such services. Since distributions to the parent REITs from these subsidiaries were dividends, the distributions qualified for the 95-percent income test, but they did not qualify for the 75-percent income test.

In addition to the 95-percent and 75-percent income tests, REITs must also satisfy several quarterly diversification tests, including: 1) the securities of any one issuer must not constitute more than 5 percent of the value of a REIT's total assets; and 2) prior to the enactment of the RMA, a REIT could not hold more than 10 percent of the voting securities of any issuer other than another REIT.³ In order to comply with the latter test, a REIT would typically own only 10 percent of the voting shares of a TPS; however, it would own close to 100 percent of the value of non-voting stock, preferred stock, or debt. To ensure that the subsidiary acted in the best interest of the REIT, the remainder of the voting shares of the TPS were often held by the REIT's managers or shareholders.⁴

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¹ Thornton Matheson, “Taxable REIT Subsidiaries: Analysis of the First Year's Returns,” *Statistics of Income Bulletin*, Spring 2005, Volume 24, Number 4, pp. 114-120.

² Between 1980 and 2000, REITs were required to distribute at least 95 percent of their incomes in order for the REIT provisions, including the deduction for dividends paid, to apply. The REIT Modernization Act reduced this ratio to its original 90 percent, equal to the distribution requirement for regulated investment companies (RICs).

³ The RMA amended the second asset diversification test to require that a REIT hold no more than 10 percent of the vote or value of a non-REIT's securities.

⁴ Joint Committee on Taxation (2001), *General Explanation of Tax Legislation Enacted in the 106th Congress*, Washington, DC, U.S. Government Printing Office, p. 68.

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The REIT Modernization Act

The RMA allowed REITs to establish taxable REIT subsidiaries, which are subject to the corporate income tax but not to the regular REIT diversification tests. Although securities of a single issuer (other than another REIT) may generally constitute no more than 5 percent of a REIT's assets, securities of one or more TRSs may constitute up to 20 percent of a REIT's assets as measured by fair market value. In addition to the 10-percent limit on REIT holdings of a single entity's voting stock, the RMA added the requirement that a REIT can own no more than 10 percent of the outstanding value of the securities of a single issuer (other than another REIT). Certain exceptions to these rules are allowed: Specifically, a REIT may own 100 percent of the vote and value of a TRS.⁵ The RMA also permitted tax-free conversion of TPSs into TRSs. Like dividends from TPSs, dividends from TRSs qualify for the 95-percent income test, but not for the 75-percent income test.

The RMA placed limits on the amount of interest and rents that a TRS can pay to a parent REIT and on what it could charge tenants for its services. For example, the amendment of section 163(j) to apply to interest paid by a TRS to its parent REIT permits deduction of such interest only if the debt-to-equity ratio of the TRS is at most 1.5 or if a TRS has no excess interest, which it defines as net interest expense less 50 percent of adjusted taxable income plus any excess limitation. (These terms will be discussed in greater detail below.) The limitation does not apply to interest on debt held by third parties, even if guaranteed by the parent REIT.

Similarly, for rents paid by a TRS to a parent REIT to qualify as rents from real property for purposes of the 95-percent and 75-percent gross income tests, a TRS may rent no more than 10 percent of any property from a parent REIT and must pay rent comparable to that of other tenants. A 100-percent excise tax is levied on income from certain transactions between a parent REIT and its TRS that are found in an audit to be non-arm's length. The 100-percent excise tax does not apply if: 1) the REIT charges substantially comparable rents to tenants who do and do not receive the TRS services; 2) the TRS charges

substantially comparable prices for services to REIT tenants and to unrelated third parties; or 3) the gross income from TRS service charges is at least 150 percent of the direct costs of providing those services.

Analysis of the Data

The data used for this analysis were compiled by the Internal Revenue Service's Statistics of Income Division (SOI) from REIT Form 1120-REIT and TRS Form 1120, *U.S. Corporate Income Tax Return*, and Form 8875, *Taxable REIT Subsidiary Election*. The corporations analyzed are TRSs that filed Form 8875 as well as Form 1120 for Tax Years 2001-2004. The data on these TRSs are from the SOI Corporate Database or the IRS Business Master File (BMF). The BMF includes all corporate tax returns from a given tax year, for which a limited number of items from Form 1120 are available. The SOI Corporate Database is a stratified probability sample of the BMF that captures most Form 1120 entries. Although the Corporate Database generally weights firms according to asset size and income, the data used in this study were selected by employer identification number to match firms that filed Form 8875 in 2001-2004 and are unweighted because they represent the universe of TRSs.

Figure A shows counts of Forms 8875 filed by corporations electing taxable REIT subsidiary status during 2001-2004 and Forms 1120 filed by corporations with employer identification numbers (EINs) matching those on Forms 8875 filed during the same period. Some 463 Forms 8875 were filed in 2001, the initial year that TRSs were authorized by the RMA. Form 8875 filings dropped to less than 100 the following year, but, since then, the pace of annual filings has risen steadily to 286 in 2004. A total of 1,051 Forms 8875 were filed during 2001-2004.

Columns 3 and 4 of Figure A show the number of Forms 1120 in the SOI Corporate Database and Business Master File for corporations whose EINs correspond to the TRS EINs on Forms 8875 filed in the same year or an earlier year during 2001-2004. Because not all TRSs that file Form 8875 subsequently file Form 1120 (presumably, REITs sometimes file TRS elections in order to reserve the option to establish a TRS, and either do not do so at all or do not do

⁵ Other exceptions to the 10-percent vote or value restriction include straight debt, mortgage loans from a REIT to its TRS, and certain grandfathered securities held or contracted for by a REIT as of July 12, 1999.

The Development of Taxable REIT Subsidiaries, 2001-2004

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Figure A

Taxable Real Estate Investment Trust Subsidiary Tax Form Filings, Tax Years 2001-2004

Year	Form 8875 initial elections [1]	Form 1120 [2]		
		Total	Statistics of Income corporate database	Business Master File
	(1)	(2)	(3)	(4)
2001	463	379	306	73
2002	99	387	309	78
2003	203	514	200	314
2004	286	704	234	470

[1] Includes all Forms 8875 for which an employer identification number and year of election are present.

[2] Includes SOI and BMF Forms 1120 which have a matching Form 8875 with a year of election, and the year of election is less than or equal to the year of the tax return.

so immediately), the number of TRS 1120s located in either the Corporate Database or the Business Master File is smaller than the number of Form 8875 elections. Some 379 TRSs filed Form 1120 in 2001; the number of TRS Form 1120 filings rises to a peak of 704 in 2004.

Figure B shows summary data on the principal parent REITs listed by TRSs on their Forms 8875. Many TRSs indicate more than one parent REIT on their Form 8875 filings; however, for 2004, data on secondary parent REITs were not processed by SOI. The statistics in Figure B, therefore, reflect only the first parent REIT listed on Form 8875, for which SOI processed data for 2001-2004. Only observations for which a Form 8875 election, a Form REIT-1120 for the parent REIT, and a Form 1120 for the TRS were all filed for a given tax year are reflected in Figure B. Reflecting the growth in the number of TRSs over the period, the number of principal parent

REITs climbs steadily from 139 in 2001 to 249 in 2004. The average number of TRSs per parent REIT is about 2.4 over the time period. (Given that only principal parent REITs are included in the data, this number likely overstates the actual average number of TRSs per parent REIT.) Total assets of principal parent REITs grew from \$190.6 billion in 2001 to \$407.7 billion in 2004, while total income grew from \$22 billion to \$35.4 billion.

Figure C shows Form 8875 and Form 1120 data for TRSs in either the SOI Corporate Database or the Business Master File for 2001-2004. Only data for TRSs that filed both Form 1120 and a simultaneous or earlier Form 8875 during that period are shown. The data thus represent the total identifiable population of TRSs in each year.

The data in Figure C generally show robust growth in the number, assets, and incomes of TRSs during 2001-2004. The number of TRSs, which corresponds to the sum of columns 3 and 4 in Figure A, rises monotonically from 379 in 2001 to 704 in 2004. Total assets in the TRS sector grew from \$16.8 billion in 2001 to a peak of \$68.2 billion in 2004, a 47-percent annual growth rate. Total gross receipts also grow rapidly from \$9 billion to \$17.8 billion between 2001 and 2004, a 23-percent annual growth rate. Total gross profits grow at a similar rate between 2001 and 2004, from \$5 billion to \$10 billion. Non-operating income grows more strongly over the time period, from \$1.8 billion in 2001 to \$6.1 billion in 2004, a 41-percent annual rate. This growth is driven partially by growth in interest received, which rises from \$296 million in 2001 to \$1.2 billion in 2004, a rate of 46 percent per year. Total TRS income thus grows at an intermediate rate of 29 percent between 2001 and 2004, from \$6.9 billion to \$16.2 billion.

Total deductions and interest paid grew at roughly the same rate of 25 percent a year between 2001 and 2004, from \$7 billion and \$457 million to \$15 billion and \$965 million, respectively. Because interest received grew faster than interest paid, total TRS net interest expense, which is important to the application of 163(j) to TRS related-party interest deductibility, declined from \$161 million in 2001 to -\$214 million in 2004: that is, over their first 4 years, TRSs as a group shift from being net interest payers to net interest recipients. TRS net depreciation deductions grew from \$361 million in 2001 to \$618 million in 2004, an 18-percent growth rate.

Figure B

Principal Parent Real Estate Investment Trusts: Selected Items, Tax Years 2001-2004

[Money amounts are in millions of dollars]

	2001	2002	2003	2004
	(1)	(2)	(4)	(3)
Number of REITs [1]	139	154	186	249
Number of TRSs owned	361	360	444	587
Total assets	190,563	204,679	272,281	407,661
Total income	22,045	22,883	27,515	35,449

[1] Includes all real estate investment trusts (REITs) for which Form 8875 was filed and identified as the principle "taxable REIT subsidiary" (TRS); for which Form 1120-REIT was filed; for whose TRSs Form 1120 was filed; and for which the year of Form 8875 election was less than or equal to the year of Forms 1120 and 1120-REIT filings.

The Development of Taxable REIT Subsidiaries, 2001-2004

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Figure C

Selected Items from U.S. Corporation Income Tax Returns for Taxable Real Estate Investment Trust Subsidiaries, Tax Years 2001-2004

[Money amounts are in millions of dollars]

	2001	2002	2003	2004
	(1)	(2)	(4)	(3)
Number of TRSs [1]	379	387	514	704
Total assets	16,776	24,806	40,280	68,235
Gross receipts	8,969	10,418	13,241	17,784
Gross profits	5,048	5,312	7,372	10,048
Nonoperating income	1,803	2,649	3,076	6,120
Interest received	296	350	575	1,179
Total income	6,851	7,961	10,448	16,168
Total deductions	7,045	8,014	10,340	15,001
Interest paid	457	493	641	965
Net depreciation	361	380	470	618
Net income (loss)	-190	-38	143	1,214
Total taxes	84	89	185	388

[1] Includes all "taxable REIT subsidiaries" (TRSs) for which Form 8875 with an election year was filed, which filed Form 1120, and where the year of Form 1120 filing was greater than or equal to the year of Form 8875 election.

TRS tax remittances grew robustly during their first 4 years, albeit from a very small base. Total TRS net income turned from negative to positive over that period, rising from -\$190 million in 2001 to \$1.2 billion in 2004. Correspondingly, their total tax payments also increased sharply, from \$84 million in 2001 to \$388 million in 2004, a 51-percent annual growth rate. As a share of gross receipts, total taxes paid increased from 0.9 percent in 2001 to 2.2 percent in 2004.

Figures D and E divide the TRS dataset into two groups depending on their responses to Part III, line 12 of Form 8875, "Did the subsidiary previously file a Federal income tax return?" Figure D includes all TRSs that answer "no" to this question, and are thus considered to be newly established companies, while Figure E includes all TRSs that answer "yes" to this question, and are thus considered to be previously established entities, such as TPSs, that converted to taxable REIT subsidiary status. Six TRSs did not answer this question, and were thus omitted from the data in Figures D and E.

In 2001, preexisting TRSs outnumber newly established TRSs by 232 to 146; however, by 2004, more rapid growth in the population of newly established TRSs leads to their outnumbering preexisting TRSs by 375 to 306. Although both groups have similar average asset size in 2001 (\$47 million for

newly established TRSs and \$42 million for preexisting TRSs), the average asset size of preexisting TRSs grows rapidly over the next 3 years to \$165 million, while that of newly formed TRSs remains fairly static, suggesting either that preexisting TRSs grew more rapidly or that preexisting entities converting to TRS status during 2002-2004 were larger than average.

Newly established TRS assets generate income at a higher rate than those of preexisting TRSs during 2001-2004. Although both have similar ratios of total income to total assets of about 41 percent in 2001, for preexisting TRSs, this ratio falls to 18 percent by 2004, while remaining at 38 percent for newly established TRSs. Nonoperating income accounts for a larger share of total income for preexisting TRSs than for newly formed TRSs; although, in 2001, nonoperating income as a share of total income is roughly equal for both groups (29 percent for new TRSs versus 24 percent for preexisting TRSs), by 2004, this ratio doubles to 48 percent for preexisting TRSs while dropping slightly to 26 percent for newly formed TRSs.

Preexisting TRSs were more likely than newly formed TRSs to have negative net income during 2001-2004: whereas newly established TRSs had positive total net income in all years, preexisting

Figure D

Selected Items from U.S. Corporation Income Tax Returns for Newly Established Taxable Real Estate Investment Trust Subsidiaries, Tax Years 2001-2004

[Money amounts are in millions of dollars]

	2001	2002	2003	2004
	(1)	(2)	(4)	(3)
Number of TRSs [1]	146	166	251	375
Total assets	6,914	8,641	9,555	16,494
Gross receipts	4,645	5,827	6,172	8,333
Gross profits	2,026	2,908	3,037	4,602
Nonoperating income	833	1,017	1,182	1,601
Interest received	63	111	99	114
Total income	2,859	3,925	4,219	6,203
Total deductions	2,648	3,791	4,171	5,853
Interest paid	76	98	92	121
Net depreciation	86	107	173	190
Net income (loss)	212	136	59	359
Total taxes	8	21	25	25

[1] Includes all "taxable REIT subsidiaries" (TRSs) for which Form 8875 with an election year was filed, which filed Form 1120, where the year of Form 1120 filing was greater than or equal to the year of Form 8875 election, and where TRS entered "No" on Form 8875, Part III, Line 12.

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Figure E

Selected Items from U.S. Corporation Income Tax Returns for Preexisting Taxable Real Estate Investment Trust Subsidiaries, Tax Years 2001-2004

[Money amounts are in millions of dollars]

	2001	2002	2003	2004
	(1)	(2)	(4)	(3)
Number of TRSs [1]	232	216	246	306
Total assets	9,853	16,005	29,995	50,692
Gross receipts	4,324	4,002	6,572	8,697
Gross profits	3,022	2,048	3,861	4,754
Nonoperating income	969	1,607	1,811	4,427
Interest received	232	238	468	1,052
Total income	3,991	3,655	5,672	9,181
Total deductions	4,396	3,831	5,727	8,495
Interest paid	381	383	545	836
Net depreciation	275	265	294	420
Net income (loss)	-403	-164	-32	722
Total taxes	76	68	114	313

[1] Includes all "taxable REIT subsidiaries" (TRSs) for which Form 8875 with an election year was filed, which filed Form 1120, where the year of Form 1120 filing was greater than or equal to the year of Form 8875 election, and where TRS entered "Yes" on Form 8875, Part III, Line 12.

TRSs had negative total net income in all but one year, 2004. Nonetheless, preexisting TRSs paid higher taxes on average than newly formed subsidiaries. The average tax bill for newly formed TRSs over the entire period was \$80,000 versus an average of \$571,000 for preexisting TRSs. As a percentage of gross receipts, total taxes were 0.3 percent for new TRSs versus 2.4 percent for preexisting subsidiaries over the time period.

In order to distinguish differences among profitable and loss-making TRSs, Figures F and G split the sample of TRSs into firms with negative and nonnegative net incomes. The data show that the growth in the population of TRSs during 2001-2004 was driven by TRSs with negative net income. Whereas the number of TRSs with nonnegative income was essentially flat over this period, fluctuating between 128 in 2001 and 120 in 2004, the number of TRSs with negative net income grew from 251 in 2001 to 584 in 2004. TRS asset growth, however, was driven more by TRSs with nonnegative net income: Average total assets per TRS with negative net income were flat at around \$20 million during the sample period, whereas average total assets for TRSs with nonnegative income grew from \$93 million in 2001 to \$466 million in 2004.

The average ratio of total income to assets for TRSs with negative net income was much higher, at 56 percent, versus 18 percent for TRSs with nonnega-

Figure F

Selected Items from U.S. Corporation Income Tax Returns for Taxable Real Estate Investment Trust Subsidiaries with Nonnegative Net Income, Tax Years 2001-2004

[Money amounts are in millions of dollars]

	2001	2002	2003	2004
	(1)	(2)	(4)	(3)
Number of TRSs [1]	128	122	92	120
Total assets	11,912	11,998	32,419	55,892
Gross receipts	1,942	4,791	3,792	7,745
Gross profits	892	1,887	2,364	4,098
Nonoperating income	1,520	1,892	2,191	5,210
Interest received	240	239	470	932
Total income	2,412	3,779	4,555	9,308
Total deductions	1,730	3,010	3,472	7,110
Interest paid	261	243	362	700
Net depreciation	145	121	137	409
Net income (loss)	682	769	1,099	2,198
Total taxes	84	82	175	373

[1] Includes all "taxable REIT subsidiaries" (TRSs) for which Form 8875 with an election year was filed, which filed Form 1120, and where the year of Form 1120 filing was greater than or equal to the year of Form 8875 election.

Figure G

Selected Items from U.S. Corporation Income Tax Returns for Taxable Real Estate Investment Trust Subsidiaries with Negative Net Income, Tax Years 2001-2004

[Money amounts are in millions of dollars]

	2001	2002	2003	2004
	(1)	(2)	(4)	(3)
Number of TRSs [1]	251	265	422	584
Total assets	4,864	12,808	7,862	12,342
Gross receipts	7,027	5,628	9,450	10,039
Gross profits	4,156	3,425	5,009	5,951
Nonoperating income	283	757	883	909
Interest received	56	111	105	248
Total income	4,439	4,182	5,892	6,860
Total deductions	5,315	5,004	6,868	7,891
Interest paid	197	250	279	266
Net depreciation	216	258	333	209
Net income (loss)	-872	-807	-955	-984
Total taxes	0	7	11	15

[1] Includes all "taxable REIT subsidiaries" (TRSs) for which Form 8875 with an election year was filed, which filed Form 1120, and where the year of Form 1120 filing was greater than or equal to the year of Form 8875 election.

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tive net income. Nonoperating income accounted for a much larger fraction of total income among TRSs with nonnegative income, at 54 percent, versus 13 percent for TRSs with negative net income. The average ratio of gross profits to gross receipts, at 58 percent, was slightly higher for TRSs with negative net income than for TRSs with nonnegative income, whose average ratio was 51 percent. Of course, TRSs with nonnegative net income paid the vast majority of taxes for the TRS population, at an average of 3.9 percent of gross receipts; however, for reasons that are not clear based on the gathered data, in all years except 2001, some TRSs with negative net income paid positive corporate income tax that was not due to the corporate alternative minimum tax.

In order to gauge the extent to which TRSs might be using (related-party) debt to reduce their taxable incomes and the extent to which 163(j) applies to TRSs, it is necessary to analyze TRS balance sheet data. Figures H and I give balance sheet data from Form 1120, Schedule L from TRSs in the SOI Corporate Database that filled out Schedule L. Corporations with assets and total receipts of less than \$250,000 are not required to complete Schedule L. As in Figures C-G, only observations with EINs that match concurrently or previously filed Forms 8875 are included. There are between 186 (2003) and 261 (2002) observations in each year. Some financial statistics described in 163(j) and the corresponding regulations (1.163(j)) had to be approximated from the available data: adjusted taxable income is proxied by net income plus interest paid and net depreciation; excess limitation carryforward is assumed to equal zero. Debt (which excludes short-term trade and operating liabilities) is proxied by the total of mortgages greater than and less than 1 year, loans from stockholders, and other liabilities. Equity is proxied by "computed net worth," the sum of capital stock, paid-in capital surplus, appropriated and unappropriated retained earnings, and adjusted shareholder equity, less the cost of treasury stock.

Like the total Corporate Database and Business Master File sample, the sample of TRSs shown in Figure H shows a decline in net interest expense from positive to negative values over the course of 2001-2004. Since the restrictions on related-party interest deductions in 163(j) apply only to firms with positive net interest expense, firms whose interest received exceeds their interest paid are not subject to those restrictions. On average, slightly less than

Figure H

Selected Items from U.S. Corporation Income Tax Returns, Schedule L for Taxable Real Estate Investment Trust Subsidiaries, Tax Years 2001-2004

[Money amounts are in millions of dollars]

	2001	2002	2003	2004
	(1)	(2)	(4)	(3)
Number of TRSs	253	261	186	225
Net interest expense	172	145	46	-212
Adjusted taxable income	640	861	1,255	2,794
Total assets	16,423	24,480	39,641	67,326
Debt	7,938	13,982	25,708	46,104
Loans from shareholders	136	552	706	632
Equity	6,480	7,065	8,907	13,758
Number of TRSs with net interest expense < 0	111	125	101	105
Number of TRSs with no excess interest	153	166	112	156
Number of TRSs with debt/equity ratio <= 1.5	130	130	84	93
debt/equity <= 1.5 or no excess interest	189	198	138	178
Number of TRSs with negative equity	76	86	53	65

NOTE: TRS is the abbreviation for "taxable REIT subsidiary." In turn, REIT is the abbreviation for real estate investment trust.

Figure I

Selected Items from U.S. Corporation Income Tax Returns, Schedule L for Taxable Real Estate Investment Trust Subsidiaries with Loans from Shareholders, Tax Years 2001-2004

[Money amounts are in millions of dollars]

	2001	2002	2003	2004
	(1)	(2)	(4)	(3)
Number of TRSs	17	16	16	22
Net interest expense	9	21	97	-30
Adjusted taxable income	-18	-34	-1	-72
Total assets	1,043	1,478	3,502	4,223
Debt	657	1,490	3,190	3,635
Loans from shareholders	136	552	706	632
Equity	-47	-387	-422	-35
Number of TRSs with net interest expense < 0	10	10	8	12
Number of TRSs with no excess interest	10	11	10	15
Number of TRSs with either debt/equity <= 1.5 or no excess interest	12	11	10	17
Number of TRSs with negative equity	8	10	9	10

NOTE: TRS is the abbreviation for "taxable REIT subsidiary." In turn, REIT is the abbreviation for real estate investment trust.

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half of all TRSs have negative net interest expense in any given year, indicating that they are not subject to 163(j). Even if a firm's net interest expense is positive, however, 163(j) may not disallow its related-party interest deductions if the firm has no "excess interest." Excess interest is defined as net interest expense less 50 percent of the firm's "adjusted taxable income." Although the proposed regulations to 163(j) stipulate a detailed definition of adjusted taxable income, this study approximates adjusted taxable income by adding interest expense and net depreciation back to net income. When 50 percent of adjusted taxable income is subtracted from excess interest, about 63 percent of TRSs have nonpositive excess interest in any given sample year.

Even if a firm has positive excess interest, its related-party debt interest may still be tax-deductible if its debt-to-equity ratio is at most 1.5. The proposed regulations to 163(j) give detailed definitions of debt and equity, which this study proxies as described above. The average debt to total asset ratio for the TRSs in the Corporate Database rose from 48 percent in 2001 to 68 percent in 2004; by contrast, the ratio of equity to total assets declined from 39 percent in 2001 to 20 percent in 2004. On average, 47 percent of all TRSs have positive debt-to-equity ratios of at most 1.5.

In order to qualify for exemption from 163(j) restrictions on related-party interest deductions, a firm must pass either the debt-to-equity ratio test or the excess interest test. On average, about three-quarters of the TRSs in the Corporate Database passed either test in any given year. There is also a fairly high incidence of negative equity among TRSs: About 30 percent of TRSs have negative equity during 2001-2004.

Figure I shows Schedule L data for TRSs with positive loans to shareholders. Very few TRSs report positive loans from stockholders: The number of firms in this category ranges between 16 in 2002 and 2003 and 22 in 2004. On average, 56 percent of these TRSs had negative net interest expense, indicating that 163(j) did not restrict their related-party interest deductions. Total adjusted taxable income was negative for this group in all years. Like the broader sample of TRSs in Figure H, about 65 percent of the TRSs in Figure G have nonpositive excess interest. However, the amount of leverage employed by TRSs with loans from stockholders is generally

higher: The average debt to total asset ratio for subsidiaries in Figure I is 88 percent over 2001-2004, and the average equity to total asset ratio is negative in all years, with an average value of -9 percent. In order to preserve taxpayer confidentiality, which prohibits publishing statistics on aggregations of less than three taxpayers, the number of firms with debt-to-equity ratios of at most 1.5 could not be stated. However, about 70 percent of the TRSs with loans from stockholders pass either the excess interest or the debt-to-equity ratio test over the time period. Roughly half of the firms covered in Figure I have negative equity.

Conclusion

The number of taxable REIT subsidiaries increased steadily in the 4 years following the enactment of the REIT Modernization Act: Some 379 TRSs filed Form 8875 and Form 1120 in 2001, after which TRS filings grew steadily to 704 in 2004. During this time, total TRS assets grew from \$16.8 billion to \$68.2 billion, and total TRS income from \$6.9 billion to \$16.2 billion. Total TRS net income also turned from negative to positive during this period, rising from -\$190 million in 2001 to \$1.2 billion. Total taxes paid rose from \$84 million (0.9 percent of gross receipts) in 2001 to \$388 million (2.2 percent of gross receipts) in 2004. TRSs that converted from preexisting entities were more likely than newly established TRSs to have negative net income; however, they also paid higher taxes relative to gross receipts than newly established TRSs (2.4 percent versus 0.3 percent).

Balance sheet data for taxable REIT subsidiaries included in the SOI Corporate Database indicate that TRSs are generally highly leveraged. About 30 percent of TRSs in the database have negative equity, and about 53 percent have debt-to-equity ratios that are either in excess of 1.5 or less than zero. Nonetheless, 76 percent of TRSs in the Corporate Database pass either the 163(j) debt-to-equity or excess interest test over the 2001-2004 period. Almost half of TRSs (48 percent) had negative net interest expense, and total net interest declined from \$172 million in 2001 to -\$212 million in 2004. Subtracting 50 percent of adjusted taxable income from net interest expense qualified an additional 16 percent of TRSs for exemption from 163(j) restrictions on related-party interest deductibility.

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Loans from stockholders did not account for a large share of taxable REIT subsidiary debt: Total loans from stockholders fluctuated between 1 percent and 4 percent of total debt during 2001-2004, and, at most, 22 TRSs showed positive loans from stockholders in any one of those years. However, those TRSs were even more highly leveraged than the broad sample of TRSs in the Corporate Database. Total equity for TRSs that borrowed from stockholders was negative in every year, as was total

adjusted taxable income, and 52 percent of subsidiaries showed negative equity. Nevertheless, 70 percent of these TRSs qualified for exemption from 163(j) restrictions on related-party interest deductibility. About 56 percent of them had negative net interest expense, while an additional 9 percent qualified by having no excess interest after deducting 50 percent of adjusted taxable income from net interest expense. The remaining 5 percent qualified by having positive debt-to-equity ratios of at most 1.5 percent.

Selected Historical and Other Data

Notice: The data on the following pages represent the most recent and most accurate information available at time of publication. However, they are subject to continuous revision as more information becomes available. Historical data tables are only published in print format on an annual basis and appear in the spring issue. Electronic versions of historical data tables will be maintained and available on SOI's pages of the IRS Web site, www.irs.gov/taxstats.

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Selected Historical and Other Data

Table 1. Individual Income Tax Returns: Selected Income and Tax Items for Specified Tax Years, 1999-2005

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

Item	1999	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All returns [1]	127,075,145	129,373,500	130,255,237	130,076,443	130,423,626	132,226,042	134,372,678
Form 1040 returns [1]	74,165,814	78,846,102	80,500,011	80,748,948	80,420,043	80,603,689	81,497,559
Form 1040A returns [1]	26,961,302	28,826,589	28,293,817	28,714,328	29,631,494	30,572,631	31,326,141
Form 1040EZ returns [1]	20,752,420	21,700,809	21,461,409	20,613,167	20,372,089	21,049,722	21,548,977
Form 1040PC returns [1]	5,195,609	N/A	N/A	N/A	N/A	N/A	N/A
Electronically filed returns [1]	35,495,320	40,078,595	46,861,486	52,798,823	61,154,815	68,380,152	73,471,852
Returns by filing status:							
Joint returns	49,900,030	50,268,249	51,034,384	51,302,089	51,510,779	51,975,649	52,505,729
Returns of married persons filing separately	2,385,646	2,486,719	2,441,481	2,330,723	2,320,275	2,453,292	2,462,804
Returns of heads of households	17,781,482	18,208,359	18,493,710	19,170,266	19,506,611	19,647,748	19,985,059
Returns of surviving spouses	80,870	63,800	74,242	73,577	83,179	82,188	71,111
Returns of single persons	56,927,117	58,346,372	58,211,420	57,199,788	57,002,781	58,067,165	59,347,974
Returns with Presidential Election Campaign Fund checkoff: [2]							
Number of returns	14,208,181	13,958,259	14,240,945	13,143,595	12,198,321	11,613,401	10,860,522
Amount	61,090	60,685	60,801	56,567	52,361	50,202	48,753
Number of boxes checked	18,306,408	19,741,877	20,266,894	18,857,672	17,453,770	16,733,962	15,711,327
Adjusted gross income (AGI) [3]	5,855,467,909	6,365,376,648	6,170,603,942	6,033,585,532	6,207,108,793	6,788,805,130	7,422,495,663
Salaries and wages:							
Number of returns	108,183,782	110,168,714	111,227,450	110,938,441	110,890,993	112,369,812	114,070,880
Amount	4,132,473,459	4,456,167,438	4,565,229,218	4,559,690,903	4,649,900,493	4,921,806,344	5,155,407,373
Taxable interest received: [4]							
Number of returns	67,218,877	68,046,458	67,479,816	63,584,806	59,459,344	57,605,888	59,249,357
Amount	175,675,236	199,321,670	198,177,814	149,024,899	127,159,692	125,474,158	162,432,720
Tax-exempt interest: [5]							
Number of returns	4,801,877	4,658,345	4,557,381	4,453,829	4,524,955	4,416,851	4,497,973
Amount	52,513,007	53,951,877	55,582,376	54,564,465	53,750,230	52,031,763	57,693,924
Dividends in AGI: [4,6]							
Number of returns	32,226,492	34,140,605	32,621,151	31,409,759	30,475,097	30,687,178	31,175,376
Amount	132,465,522	146,987,679	119,533,324	103,241,332	115,141,232	146,838,808	166,482,004
Qualified dividends in AGI: [6]							
Number of returns	n.a.	n.a.	n.a.	n.a.	22,449,379	24,549,867	25,853,686
Amount	n.a.	n.a.	n.a.	n.a.	80,994,736	110,500,411	118,980,474
Business or profession net income: [7]							
Number of returns	13,165,318	13,312,586	13,611,559	13,750,982	14,442,334	15,057,938	15,748,896
Amount	233,746,237	244,598,112	249,507,231	256,878,740	268,581,833	290,224,776	314,717,429
Business or profession net loss: [7,8]							
Number of returns	4,146,807	4,287,423	4,406,790	4,846,323	4,973,314	5,194,140	5,308,433
Amount	25,332,170	30,732,759	32,734,734	36,095,167	38,926,548	43,007,488	45,016,373
Net capital gain in AGI: [6,9]							
Number of returns	22,497,646	22,645,728	12,630,577	9,969,731	9,081,384	10,875,231	12,017,926
Amount	552,604,872	644,284,795	348,132,997	268,202,336	322,973,738	497,227,695	685,194,041
Net capital loss in AGI: [6,10]							
Number of returns	5,202,857	6,875,037	10,839,824	13,279,894	12,808,303	11,513,428	10,022,532
Amount	9,846,756	13,742,364	22,964,034	29,833,878	28,952,022	25,492,046	22,136,901
Sales of property other than capital assets, net gain: [11]							
Number of returns	834,575	827,490	772,632	789,392	798,662	857,903	900,568
Amount	6,557,503	7,445,007	7,208,365	7,291,728	8,138,821	10,473,327	12,843,235
Sales of property other than capital assets, net loss: [11]							
Number of returns	898,350	872,562	843,253	938,985	955,198	892,031	876,635
Amount	8,269,794	8,364,141	9,105,361	9,678,258	8,469,180	7,970,811	9,180,303
Pensions and annuities in AGI: [12]							
Number of returns	21,343,646	21,765,211	22,262,774	22,794,417	22,822,842	23,123,390	23,247,374
Amount	304,310,714	325,827,702	338,745,409	357,840,960	372,931,442	394,285,849	420,144,855
Unemployment compensation: [13]							
Number of returns	6,775,723	6,478,292	8,799,886	10,334,639	10,065,230	9,094,911	7,887,700
Amount	17,530,779	16,913,305	26,890,925	43,129,155	44,007,879	32,740,272	27,857,367

Footnotes at end of table.

Selected Historical and Other Data

Table 1. Individual Income Tax Returns: Selected Income and Tax Items for Specified Tax Years, 1999-2005—Continued

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

Item	1999	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Social Security benefits in AGI: [14]							
Number of returns	9,459,189	10,608,572	10,779,280	10,702,502	10,975,002	11,691,859	12,660,754
Amount	75,078,976	89,964,021	93,559,363	93,459,494	97,768,201	110,462,387	124,829,069
Rent net income: [7]							
Number of returns	4,355,533	4,200,588	4,226,121	4,228,529	4,086,160	4,078,981	4,109,952
Amount	43,459,764	45,099,159	47,307,618	49,265,943	49,236,378	50,640,786	53,536,785
Rent net loss: [7]							
Number of returns	4,616,526	4,520,263	4,504,545	4,500,788	4,529,086	4,731,529	4,951,857
Amount	28,341,505	30,309,122	31,057,269	34,253,712	37,558,496	44,672,209	51,914,832
Royalty net income: [15]							
Number of returns	1,117,408	1,103,851	1,133,409	1,118,018	1,242,840	1,296,467	1,342,691
Amount	6,482,226	7,997,803	10,630,523	8,013,942	10,729,655	12,421,989	16,121,113
Royalty net loss: [15]							
Number of returns	46,926	36,033	46,313	38,389	32,790	31,654	33,393
Amount	131,699	100,895	89,482	140,775	123,569	186,747	197,030
Partnership and S corporation net income: [16]							
Number of returns	4,154,776	4,179,537	4,356,933	4,329,316	4,453,988	4,738,228	4,992,108
Amount	269,757,830	285,424,865	301,558,966	314,665,137	333,029,137	398,690,527	492,020,754
Partnership and S corporation net loss: [8,16]							
Number of returns	2,121,841	2,120,784	2,139,574	2,394,105	2,552,592	2,498,144	2,539,384
Amount	58,685,867	72,511,266	76,448,871	76,697,948	78,972,015	82,697,364	89,694,035
Estate or trust net income:							
Number of returns	516,024	556,534	493,247	539,946	499,416	507,008	493,504
Amount	10,975,854	12,134,000	12,378,332	12,459,427	13,498,758	15,436,171	18,138,463
Estate or trust net loss:							
Number of returns	40,071	39,026	44,096	41,508	33,117	35,710	35,713
Amount	1,092,143	1,127,838	2,158,566	1,219,102	1,083,966	1,435,566	1,654,404
Farm net income:							
Number of returns	725,782	703,083	649,173	556,331	592,019	588,823	610,647
Amount	9,201,162	8,270,319	7,656,704	6,324,051	7,472,503	7,371,027	8,484,072
Farm net loss: [8]							
Number of returns	1,320,526	1,358,701	1,357,698	1,438,741	1,405,097	1,416,076	1,370,603
Amount	15,444,078	17,305,037	18,661,484	20,743,770	19,843,995	20,610,232	20,652,859
Total statutory adjustments:							
Number of returns [17]	22,659,973	23,197,425	23,497,092	28,911,078	30,382,069	32,153,965	33,591,124
Amount [17]	56,698,800	58,609,518	60,572,768	77,161,432	87,575,677	98,046,679	109,396,547
Educator expenses:							
Number of returns	N/A	N/A	N/A	2,884,403	3,240,673	3,402,468	3,503,719
Amount	N/A	N/A	N/A	712,505	805,734	858,457	877,796
Certain business expenses of reservists, performing artist, and fee-basis government officials:							
Number of returns	N/A	N/A	N/A	N/A	N/A	105,135	100,111
Amount	N/A	N/A	N/A	N/A	N/A	252,597	285,073
Individual Retirement Arrangements: [18]							
Number of returns	3,687,149	3,505,032	3,448,457	3,277,671	3,418,494	3,330,763	3,256,066
Amount	7,883,438	7,477,074	7,406,866	9,462,404	10,006,814	10,028,607	12,003,037
Student loan interest deduction:							
Number of returns	4,136,505	4,477,986	4,405,667	6,640,784	6,953,370	7,527,249	8,072,896
Amount	2,254,531	2,639,472	2,711,733	4,469,546	4,409,816	4,398,734	5,052,720
Tuition and fees deduction:							
Number of returns	N/A	N/A	N/A	3,444,941	3,571,154	4,710,253	4,696,013
Amount	N/A	N/A	N/A	6,154,145	6,683,631	10,589,279	10,846,990
Health savings account deduction: [19]							
Number of returns	N/A	N/A	N/A	N/A	N/A	90,857	215,781
Amount	N/A	N/A	N/A	N/A	N/A	190,732	510,690
Medical savings account deduction: [20]							
Number of returns	50,393	65,415	69,957	61,118	67,347	32,334	18,808
Amount	81,977	120,330	123,296	121,282	129,214	66,602	41,341

Footnotes at end of table.

Selected Historical and Other Data

Table 1. Individual Income Tax Returns: Selected Income and Tax Items for Specified Tax Years, 1999-2005—Continued

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

Item	1999	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Keogh and self-employed retirement plans:							
Number of returns	1,264,007	1,287,706	1,290,496	1,186,947	1,208,801	1,201,332	1,256,900
Amount	11,928,242	12,475,396	13,114,412	16,349,738	17,795,957	19,295,952	21,268,404
Deduction for self-employment tax:							
Number of returns	14,029,609	14,300,141	14,574,036	14,664,473	15,373,279	15,920,203	16,694,655
Amount	16,689,650	17,392,967	18,134,959	18,687,162	19,791,285	21,109,366	22,733,881
Self-employed health insurance: [21]							
Number of returns	3,491,539	3,564,624	3,559,792	3,571,152	3,802,277	3,883,687	3,901,082
Amount	6,755,071	7,569,198	8,177,397	10,494,247	16,454,211	18,457,063	19,645,889
Exemptions:							
Number of exemptions, total	248,657,119	252,332,427	256,186,046	258,716,374	261,126,373	263,896,304	336,959
Amount [22]	669,241,317	690,109,474	727,554,990	761,440,430	781,305,067	800,690,043	2,360,983
Number of boxes checked for taxpayer's age 65 or over [22]	21,785,802	22,475,999	22,825,923	22,948,745	23,178,832	23,790,587	269,043,070
Primary taxpayer	15,760,847	16,159,749	16,443,262	16,444,649	16,626,808	16,961,345	839,904,186
Spouse	6,024,955	6,316,250	6,382,661	6,504,096	6,552,024	6,829,242	24,246,402
Domestic production activities deduction:							
Number of returns	N/A	N/A	N/A	N/A	N/A	N/A	17,381,797
Amount	N/A	N/A	N/A	N/A	N/A	N/A	6,864,605
Total deductions:							
Number of returns [23]	125,999,671	128,204,824	128,800,540	128,302,742	128,592,872	130,351,990	132,596,649
Amount [23]	1,205,337,338	1,293,181,391	1,366,435,851	1,390,114,852	1,457,644,886	1,559,171,075	1,702,558,646
Standard deductions: [24]							
Number of returns	85,755,366	85,670,504	84,238,233	82,655,191	84,643,281	84,016,753	84,841,222
Amount	463,960,491	470,820,881	466,971,032	477,170,045	539,921,089	545,082,218	564,186,053
Returns with additional standard deductions for age 65 or over or blindness:							
Number of returns	11,200,024	11,330,554	11,116,629	10,857,098	11,200,647	10,985,079	10,996,440
Amount	14,264,309	14,735,998	14,936,559	14,897,487	15,858,963	15,850,401	16,561,658
Itemized deductions:							
Number of returns [25]	40,244,305	42,534,320	44,562,308	45,647,551	43,949,591	46,335,237	47,755,427
Amount [25]	741,376,847	822,360,510	884,528,260	898,047,320	901,864,834	998,238,457	1,121,810,935
Medical and dental expense: [26]							
Number of returns	5,884,418	6,513,104	7,571,522	8,547,481	8,678,320	9,530,675	9,917,189
Amount	35,375,998	39,251,004	47,071,726	52,276,395	56,007,076	61,503,014	67,353,932
Taxes paid: [27]							
Number of returns	39,564,240	41,823,555	43,797,188	44,793,590	43,061,888	46,009,291	47,353,480
Amount	265,365,133	294,711,547	307,974,817	302,653,989	310,896,704	362,608,853	400,390,045
Interest paid: [28]							
Number of returns	33,705,780	35,405,336	36,800,610	37,637,017	36,211,578	38,110,298	39,015,536
Amount	291,552,907	322,931,506	349,900,751	351,495,773	340,319,125	356,355,994	405,718,259
Home mortgage interest paid:							
Number of returns	33,267,570	34,914,116	36,331,190	37,216,044	35,797,375	37,691,995	38,574,509
Amount	272,148,740	299,963,368	330,692,376	336,570,649	325,191,983	340,476,440	383,733,110
Charitable contributions:							
Number of returns	35,523,471	37,524,825	39,386,782	40,399,695	38,626,902	40,623,426	41,381,465
Amount	125,798,548	140,681,631	139,241,476	140,571,365	145,702,137	165,564,388	183,390,686
Taxable income:							
Number of returns	102,845,571	105,259,292	104,174,654	102,275,969	101,392,812	102,737,959	104,330,653
Amount	4,136,119,714	4,544,242,424	4,268,506,425	4,096,127,651	4,200,218,439	4,670,165,637	5,137,165,874
Income tax before credits: [29,30]							
Number of returns	102,834,362	105,277,966	104,195,834	102,293,722	101,412,777	102,740,921	104,345,964
Amount	906,811,755	1,018,218,948	933,567,474	836,842,718	790,005,881	884,342,703	990,151,766
Tax credits:							
Number of returns [31,32]	36,621,595	37,736,095	49,792,710	40,614,049	41,091,029	41,694,252	42,246,181
Total amount [31,32]	35,892,344	37,722,293	45,631,198	39,862,411	41,995,756	52,366,870	55,316,421
Child care credit:							
Number of returns	6,182,193	6,368,101	6,184,507	6,185,855	6,313,297	6,316,649	6,500,596
Amount	2,675,147	2,793,860	2,721,061	2,706,539	3,206,890	3,337,984	3,462,104
Credit for the elderly or disabled:							
Number of returns	181,813	155,796	139,097	133,538	123,147	107,914	101,627
Amount	33,629	32,608	30,496	21,119	20,257	18,740	14,127

Footnotes at end of table.

Selected Historical and Other Data

Table 1. Individual Income Tax Returns: Selected Income and Tax Items for Specified Tax Years, 1999-2005—Continued

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

Item	1999	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Child tax credit: [33]							
Number of returns	26,016,019	26,404,521	26,452,875	25,939,801	25,672,254	25,988,711	25,950,568
Amount	19,398,625	19,689,359	22,427,229	21,520,271	22,788,025	32,300,455	32,047,620
Education credits:							
Number of returns	6,436,654	6,815,316	7,212,554	6,475,134	7,298,227	7,180,884	7,057,251
Amount	4,772,443	4,851,178	5,156,254	4,882,853	5,843,029	6,016,805	6,119,631
Retirement savings contributions credit:							
Number of returns	N/A	N/A	N/A	5,307,176	5,296,688	5,288,732	5,293,605
Amount	N/A	N/A	N/A	1,058,219	1,034,394	1,011,506	944,531
Foreign tax credit:							
Number of returns	3,266,544	3,935,699	3,942,604	3,748,974	4,145,174	4,700,259	5,398,046
Amount	4,941,010	5,990,360	6,254,559	5,933,600	5,805,555	6,757,994	9,361,989
General business credit:							
Number of returns	287,658	275,116	269,648	284,720	262,738	248,506	251,386
Amount	783,920	764,253	713,974	750,855	612,744	635,391	877,850
Income tax after credits: [29]							
Number of returns	94,511,758	96,815,794	94,763,163	90,963,775	88,921,898	89,101,934	90,593,079
Amount	870,919,411	980,496,655	887,936,276	796,980,307	748,010,125	831,975,834	934,835,345
Total income tax: [34]							
Number of returns	94,546,080	96,817,602	94,763,530	90,963,896	88,921,904	89,101,934	90,593,081
Amount	877,401,489	980,645,201	887,973,968	796,986,268	748,017,488	831,976,333	934,835,769
Alternative minimum tax: [35]							
Number of returns	1,018,063	1,304,198	1,120,047	1,910,789	2,357,975	3,096,299	4,004,756
Amount	6,477,697	9,600,840	6,756,705	6,853,901	9,469,803	13,029,239	17,421,071
Earned income credit: [36]							
Number of returns	19,258,715	19,277,225	19,593,122	21,703,187	22,024,227	22,269,577	22,751,904
Amount	31,901,107	32,296,341	33,375,971	38,198,572	38,657,067	40,024,050	42,410,290
Used to offset income tax before credits:							
Number of returns	5,352,300	5,416,246	4,412,721	4,168,977	3,606,251	2,975,197	2,896,347
Amount	1,918,065	1,968,680	1,470,200	1,114,948	926,381	767,524	745,322
Used to offset other taxes:							
Number of returns	3,137,122	3,147,876	3,506,426	4,106,193	4,401,160	4,630,477	4,756,198
Amount	2,378,860	2,523,703	2,862,938	3,346,682	3,718,355	3,957,021	4,199,530
Excess earned income credit (refundable):							
Number of returns	16,049,812	16,125,542	16,631,224	18,780,033	19,162,460	19,448,355	20,087,050
Amount	27,604,182	27,803,959	29,042,833	33,736,942	34,012,332	35,299,505	37,465,440
Tax payments, total:							
Number of returns [37]	119,809,259	122,243,874	123,451,339	120,083,021	123,461,513	124,989,700	122,684,049
Amount [37]	981,100,157	1,084,868,447	1,076,500,696	953,697,397	974,543,079	1,036,118,363	1,083,700,046
Income tax withheld: [38]							
Number of returns	111,193,931	113,733,442	114,798,386	114,861,744	114,861,706	116,312,978	118,161,380
Amount	695,526,980	763,901,388	773,325,891	717,492,263	703,758,484	731,734,362	782,659,594
Excess Social Security tax withheld:							
Number of returns	1,377,613	1,640,582	1,436,746	1,145,352	1,121,141	1,242,604	1,383,240
Amount	1,712,649	2,184,849	1,915,349	1,564,478	1,566,411	1,727,641	2,023,314
Estimated tax payments: [39]							
Number of returns	13,169,356	13,326,669	13,167,855	12,434,579	11,576,213	10,996,504	11,053,213
Amount	196,915,946	221,621,893	220,195,712	198,177,595	182,906,911	188,770,357	221,001,524
Payments with requests for extension of filing time: [40]							
Number of returns	1,510,206	1,610,937	1,448,214	1,235,156	1,333,579	1,518,779	1,627,572
Amount	53,984,319	63,396,711	42,495,018	36,321,934	38,303,188	59,268,206	77,833,848
Tax due at time of filing:							
Number of returns	29,200,902	30,624,423	24,581,130	22,818,761	21,072,333	24,452,350	25,659,937
Amount	119,091,512	134,944,362	91,822,703	82,287,723	73,741,408	99,683,799	118,232,296
Tax overpayments, total: [41]							
Number of returns	94,827,237	95,921,082	102,310,896	103,462,884	105,361,848	103,706,648	104,778,359
Amount	182,049,186	196,198,780	236,982,082	239,784,002	254,553,541	255,064,839	272,110,056
Overpayment refunds:							
Number of returns	91,600,741	93,000,030	99,011,975	100,143,606	102,004,984	100,674,244	101,870,385
Amount	155,513,635	167,577,365	202,274,032	205,987,348	219,751,889	221,371,474	232,975,616

Footnotes at end of table.

Selected Historical and Other Data

Table 1. Individual Income Tax Returns: Selected Income and Tax Items for Specified Tax Years, 1999-2005—Continued

Footnotes

N/A—Not applicable.

n.a.—Not available.

- [1] Year-to-year comparability of the "all returns" total is affected by changes in dollar income filing thresholds, while year-to-year comparability of the number of returns by type of tax form used is affected by changes in the specific filing requirements, including adjustments for inflation, for each form. In general, the filing of "short forms" (mostly Forms 1040A and 1040EZ) has been encouraged by IRS to simplify both taxpayer filing requirements and IRS processing. Filing requirements for each of the short forms have, therefore, been gradually liberalized to facilitate their use. Increases in the number of short forms have mostly been at the expense of "long form" 1040 usage (although increases in the number of each of the short forms have often been at the expense of one short form over another). While the number of 1040 (paper) returns has, therefore, increased over the time period shown, the rate of increase has been reduced by the use of the short forms, and, later, by electronic filing options (see below), including, for 1999, use of Form 1040PC. For additional information about the return filing requirements, see the annual reports, *Statistics of Income—Individual Income Tax Returns*. Forms 1040, 1040A, and 1040EZ include "standard" electronically filed ("ELF" or "e-file") returns, and Form 1040EZ returns filed electronically by telephone ("TeleFile" 1999-2004 only). Form 1040PC (computer-generated "paper") returns were not reclassified for Statistics of Income for 1999; data for Forms 1040, 1040A, and 1040EZ for these years are not comparable with preceding years (Form 1040PC did not apply after 1999).
- [2] Taxpayers could elect to assign \$3 of the income tax reported on their returns (\$6 on a joint return, if both spouses contributed) to help pay for the cost of Presidential election campaigns. To do so, a taxpayer had to check a box on the tax return. The relationship between (a) the number of returns and boxes checked and (b) the dollar amounts shown is only approximate because the frequencies and the amounts were obtained from different sources, the frequencies from Statistics of Income tax return data and the dollar amounts from IRS monthly tax collections, aggregated by calendar year. It should be noted that the frequencies and amounts are related to the tax year for which statistics are shown, even though the designation by the taxpayer occurred in the following year, when the income tax return was filed and processed.
- [3] Less deficit.
- [4] Taxable interest includes "dividends" on deposits and withdrawable shares in mutual savings banks, savings and loan associations, and credit unions, but excludes interest from Regulated Investment Companies on money market mutual funds, which is included in "dividends" in "adjusted gross income" (AGI).
- [5] Not included in AGI. Represents interest on State and local government obligations, including tax-exempt interest dividends from Regulated Investment Companies.
- [6] Dividends in AGI exclude capital gains and liquidating dividends, reflected in the statistics for net capital gain or loss in AGI, but include interest from Regulated Investment Companies on money market mutual funds. Qualified dividends are the ordinary dividends received after May 5, 2003, that met certain conditions. These included: the dividend must have been paid by a U.S. corporation or a "qualified" foreign corporation; the stock ownership must have met certain holding period requirements; the dividends were not from certain institutions, such as mutual savings banks, cooperative banks, credit unions, tax-exempt organizations, or farmer cooperatives; and the dividends were not for any share of stock which was a part of an employee stock ownership plan (ESOP).
- [7] Rent net income (or loss) excludes sole proprietorship (including farm) rental income or loss; these are included in business or profession net income or loss. Rental losses are before "passive loss" limitation and, therefore, exceed the amount included in AGI.
- [8] Losses are after "passive loss" limitation.
- [9] Includes capital gains from the sale of assets held for personal use or investment, and also net gains from the sale of certain business property treated as net capital gains and from "involuntary conversions" of property, such as by casualty or theft. Also includes capital gains received from partnerships and S corporations. See also footnote 15. Data represent total capital gains. Total includes capital gain distributions from Regulated Investment Companies. For other changes affecting capital gains, see *Statistics of Income—Individual Income Tax Returns*, various years. See also footnote 6.
- [10] Includes capital losses (after limitation) from the sale of assets held for personal use or investment, including losses in excess of net gains from the sale of certain business property treated as net capital losses and "involuntary conversions" of property, such as by casualty or theft. Also includes capital losses received from partnerships and S corporations. See also footnotes 6, 15, and 16.
- [11] Net gain or loss, not includable in capital gain or loss, from the sale of business property (excluding inventories and certain other assets) and "involuntary conversions" of property, such as by casualty or theft. See also footnote 15.
- [12] Excludes Individual Retirement Arrangement (IRA) distributions.
- [13] Represents total unemployment compensation.
- [14] Up to 85 percent of Social Security benefits were taxable.
- [15] Excludes certain royalties included in the computations of capital gain or loss and of ordinary gain or loss in sales of noncapital assets.
- [16] Excludes capital gains and losses.
- [17] Includes adjustments not shown separately in this table. Total excludes certain business-related expenses, deduction for two-earner married couples, and certain alimony payments, but includes the self-employment health insurance deductions (liberalized effective 1998).
- [18] Deductible Individual Retirement Arrangement (IRA) contributions were limited, then liberalized somewhat. Contributions to education and Roth IRAs were nondeductible and are, therefore, not included in the statistics.
- [19] Beginning in Tax Year 2004, a taxpayer could have taken a deduction for contributions to a Health Savings Account. The deduction was limited to the annual deductible on the qualifying high deductible health plan and other criteria.
- [20] The limitation on the deduction was raised, starting with 1999.
- [21] The deduction was liberalized, starting with 1999.

Table 1. Individual Income Tax Returns: Selected Income and Tax Items for Specified Tax Years, 1999-2005—Continued

Footnotes—Continued

- [22] Exemption amounts were indexed for inflation. Amounts were also limited for taxpayers with high incomes. A check box on the return was used for taxpayer's age 65 or over, in general, for use in establishing claims for the additional standard deductions, but many taxpayers not claiming the additional deductions also used the check box. The amount shown for exemptions excludes amounts in excess of AGI, which were reported but could not be used by the taxpayer. The number of exemptions and amounts also excludes the number and amounts reported on returns with no AGI, which did not figure into the computation of tax as a result.
- [23] In general, represents the sum of standard and itemized deductions from AGI to compute "taxable income" (the tax base for the regular income tax), but also includes deductions in excess of AGI that could not be used in the computation. Deductions erroneously reported on returns with no AGI were excluded from the deduction statistics. Includes revised itemized deductions (see also footnotes 25-26), "basic" standard deduction, and "additional" standard deductions for age 65 or over or for blindness (for changes in the standard deduction and its relation to the zero bracket amount, see *Statistics of Income—Individual Income Tax Returns*, for appropriate years). Total itemized deductions are after statutory limitation (see footnote 25).
- [24] Standard deductions were indexed for inflation. Statistics for taxpayers with the additional standard deduction for age 65 or over exclude those who checked the box on tax returns indicating age 65 or over, but then itemized their deductions instead of claiming standard deductions (see footnote 22). For the percentages of AGI used for the standard deduction and the limitation on the deduction, see *Statistics of Income—Individual Income Tax Returns*.
- [25] Includes itemized deductions not shown separately in this table, including revised deductions, for "miscellaneous expenses" after limitation and for employee moving expenses. In general, total itemized deductions were limited for certain high-income taxpayers. This limitation was indexed for inflation.
- [26] Deductible medical and dental expenses were limited, based on a revised percentage of AGI. The definition of expenses includes payments for certain long-term care insurance premiums and for the unreimbursed cost of certain long-term care of a chronically ill individual.
- [27] Starting with 2004, a taxpayer could have elected to deduct State and local general sales taxes instead of State and local income taxes as itemized deductions on Schedule A.
- [28] Deductions for mortgage real estate loan interest were limited. Personal interest was not deductible.
- [29] Includes "alternative minimum tax" (AMT), starting with 2000. For previous years, AMT was excluded and was reflected only in "total income tax" (see footnote 34).
- [30] Different tax rate structures for the regular income tax applied to Tax Years 1999-2002, 2003, 2004, and 2005. Indexing of tax rate boundaries for inflation existed. The preferential maximum tax rate on net long-term capital gains under "alternative tax" was revised over the years. Alternative tax was abolished, but a maximum capital gain tax rate less than the maximum regular tax rate continued to apply under certain conditions. For additional information on changes affecting tax computations, see Table A of the appendix to the historical section of this report and *Statistics of Income—Individual Income Tax Returns*.
- [31] Includes that portion of the "earned income credit" used to offset income tax before credits. Earned income credit is shown below in Table 1. See also footnote 36.
- [32] Includes credits such as the low-income housing credit, child adoption credit, and "empowerment zone employment" (EZE) credit not shown separately.
- [33] Allowable credit per child was increased, starting with 1999.
- [34] The statistics for all years shown are comparable. However, prior to Tax Year 2000, total income tax is the sum of two components, income tax after credits and "minimum tax" or "alternative minimum tax (AMT)"; see footnotes 29 and 35. Starting with Tax Year 2000, total income tax is, in general, the same as income tax after credits, which was redefined to include AMT. (The small difference between the two amounts for 2000 is due mainly to the inclusion in the statistics for Tax Year 2000 of prior-year returns filed in Calendar Year 2001 that were used as proxies for Tax Year 2000 returns filed after 2001; the AMT on these returns was included in total income tax, but not in income tax before or after credits, consistent with the reporting sequence on the tax return forms for these years. The same is true for Tax Year 2002 for prior returns filed in Calendar Year 2003 for Tax Year 2000 and earlier. To a far lesser extent, the difference between total income tax and income tax after credits represents the tax on accumulation distributions of trusts, which was included in total income tax only.) Total income tax reflects the amount reported on the tax return and is, therefore, before any examination or enforcement activities by the Internal Revenue Service. It represents the income tax liability that was payable to the U. S. Department of the Treasury.
- [35] Under "alternative minimum tax" (AMT), generally high-income taxpayers to whom the tax applied were required to pay the larger of the regular income tax or the AMT. As of 2004, examples of preferences or adjustments subject to recapture through the AMT were accelerated depreciation, incentive stock options, certain itemized deductions, personal exemptions, certain tax-exempt interest, and income loss from tax-shelter farm or "passive" investment activities. AMT is shown separately in the statistics for all years. However, starting with 2000, AMT is also included in "income tax before credits," as well as in "income tax after credits" and "total income tax." Previously, AMT was only included in "total income tax."
- [36] In Table 1, the amounts "used to offset income tax before credits" and "used to offset other taxes" (that are income-related) are reflected in the statistics for "total tax credits"; however, "excess earned income credit (refundable)" is reflected in the statistics for tax "overpayments." The refundable portion of the credit is the amount (in excess of the taxes) that could not be credited, including any "advance earned income credit payments" on those returns that had such an excess. ("Advance earned income credit payments" were made to employees electing to receive such payments currently through their paychecks. Such "payments" are included in the statistics only if the employees also met the tax return filing requirements; advance payments received by those not required to file are, therefore, excluded.)
- [37] Represents payments reflecting the sum of "total income tax" (see footnote 34), tax recapture of certain prior-year tax credits, tax applicable to Individual Retirement Arrangements (IRAs), and Social Security taxes on "self-employment income" and on certain employee tip income, as well as on other income-related taxes applicable to the years shown (see *Statistics of Income—Individual Income Tax Returns*). The total also includes the following not shown separately below in Table 1: "advance earned income credit payments" and credits for (a) capital gain tax paid by a Regulated Investment Company, but considered paid by shareholders, and (b) part of the purchase price of a diesel-powered highway vehicle.

Selected Historical and Other Data

Table 1. Individual Income Tax Returns: Selected Income and Tax Items for Specified Tax Years, 1999-2005—Continued

Footnotes—Continued

[38] Represents tax withheld on (a) salaries and wages; (b) certain tip income; (c) pensions and annuities; (d) certain gambling winnings; and (e) distributions from profit-sharing plans, retirement plans, and Individual Retirement Arrangements (IRAs). Also included are taxes withheld as a result of "backup withholding" on certain interest, dividends, and royalty payments, which otherwise were not subject to withholding.

[39] Represents the sum of (a) "estimated tax," generally paid quarterly throughout the tax year by self-employed and certain other taxpayers with insufficient or no tax withheld, and (b) prior-year tax overpayments taxpayers elected to credit to their current-year's "estimated tax" in lieu of requesting a refund.

[40] Represents the sum of payments made with a request for an "automatic" 4-month extension of time in which to file an income tax return, and payments with a request for an additional 2-month extension. Notwithstanding the timing of these requests, full payment of a tax estimate for the year had to be made with the original application; if adjustments to the amount thus paid were later necessitated, the difference was either refundable or payable subject to an interest charge (which is not reflected in the tax statistics).

[41] Includes refunds (shown separately), plus credits to the following year's "estimated tax" and the refundable portion of the "earned income credit" (see footnote 36). The taxes reflected in tax overpayments are the same as those listed in footnote 38.

NOTES: Detail may not add to totals because of rounding. All amounts are in current dollars. Most of the data are subject to sampling error; tax law and tax form changes affect the year-to-year comparability of the data.

SOURCE: Except for dollar amounts associated with the Presidential election campaign checkoff, data are from *Statistics of Income—Individual Income Tax Returns*, appropriate years. Depending on the year, dollar amounts associated with the Presidential election campaign checkoff were accumulated by calendar year either from U.S. Treasury Department, Internal Revenue Service, "Table S-1 Collections, Comparative Summary, Document 7038," Report NO-Treas-103, monthly, or from unpublished monthly data from Chief Financial Officer, Office of Finance, Revenue Accounting Division, Office of Revenue Systems.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
UNITED STATES [2]						
Number of returns	139,230,752	93,223,652	18,712,454	11,118,868	12,099,481	4,076,297
Number of joint returns	53,302,014	20,010,697	11,080,857	8,559,118	10,196,871	3,454,471
Number with paid preparer's signature	82,396,246	53,803,574	11,311,421	6,640,212	7,435,702	3,205,337
Number of exemptions	275,374,078	155,469,054	44,281,309	29,599,434	34,233,371	11,790,910
Adjusted gross income (AGI) [3]	7,945,456,251	1,808,814,183	1,150,485,615	959,904,874	1,606,629,900	2,419,621,676
Salaries and wages in AGI [4]: Number	116,481,590	75,535,677	16,606,191	9,987,398	10,898,409	3,453,915
Amount	5,469,458,338	1,556,229,434	911,058,682	752,114,275	1,205,430,026	1,044,625,921
Taxable interest: Number	62,626,654	28,981,063	11,317,654	8,165,230	10,274,579	3,888,128
Amount	219,050,137	46,813,791	21,575,634	17,836,409	33,698,123	99,126,180
Ordinary dividends: Number	31,565,329	12,559,004	5,217,663	4,214,365	6,392,783	3,181,514
Amount	196,605,132	23,588,372	14,013,246	13,381,735	31,862,756	113,759,023
Business or profession net income (less loss):						
Number	21,893,618	12,975,643	3,130,771	2,077,755	2,594,528	1,114,921
Amount	276,119,485	70,742,656	30,693,035	26,075,041	59,833,519	88,775,234
Number of farm returns	2,002,357	1,057,635	362,862	231,211	234,663	115,986
Net capital gain (less loss) in AGI: Number	26,753,900	10,390,092	4,175,713	3,433,131	5,598,859	3,156,105
Amount	724,512,280	27,411,293	16,234,336	18,956,242	64,457,275	597,453,136
Taxable Individual Retirement Arrangements distributions: Number	9,988,389	5,071,025	1,839,884	1,241,677	1,381,037	454,766
Amount	127,401,289	32,712,585	21,018,646	19,512,340	33,190,077	20,967,641
Pensions and annuities in AGI: Number	23,982,229	12,966,394	4,321,741	2,809,252	3,046,711	838,131
Amount	448,610,457	150,354,797	90,126,922	71,888,967	100,284,342	35,955,430
Unemployment compensation [5]: Number	7,392,700	5,056,824	1,192,708	607,291	466,931	68,946
Amount	26,721,195	17,364,497	4,555,201	2,400,208	2,038,464	362,824
Social Security benefits in AGI: Number	13,652,291	6,074,827	3,167,307	1,859,393	1,854,034	696,730
Amount	146,338,833	30,050,925	40,066,428	29,605,131	32,890,842	13,725,509
Self-employment retirement plans: Number	1,202,852	161,562	124,305	135,263	367,997	413,724
Amount	21,420,430	969,516	1,032,408	1,341,019	5,491,852	12,585,636
Total itemized deductions [6]: Number	49,597,995	16,158,359	10,640,415	8,255,122	10,688,957	3,855,142
Amount	1,244,097,705	255,263,977	195,725,575	175,023,328	300,934,309	317,150,513
State and local income taxes: Number	36,736,323	9,895,924	8,197,113	6,648,239	8,799,421	3,195,626
Amount	251,464,880	18,188,920	24,467,611	27,545,393	59,990,322	121,272,634
State and local general sales taxes: Number	10,660,095	4,860,539	2,079,047	1,401,174	1,696,647	622,688
Amount	18,191,987	4,554,780	3,219,511	2,709,276	4,279,206	3,429,213
Real estate taxes: Number	42,732,252	12,309,937	9,262,170	7,530,412	10,000,766	3,628,967
Amount	158,951,311	30,938,111	25,682,746	24,210,444	44,207,338	33,912,671
Taxes paid: Number	49,353,627	15,909,294	10,631,896	8,260,785	10,694,239	3,857,413
Amount	473,552,930	60,204,113	56,683,581	57,152,498	117,301,083	182,211,655
Mortgage Interest paid: Number	40,517,891	11,694,779	8,952,087	7,233,871	9,397,210	3,239,944
Amount	480,952,266	109,040,850	86,325,225	75,597,135	123,140,291	86,848,761
Contributions: Number	41,366,929	11,501,687	8,981,556	7,326,766	9,896,760	3,660,160
Amount	182,130,568	22,759,171	22,216,850	21,012,118	38,659,643	77,482,786
Taxable income: Number	107,086,450	61,303,313	18,556,666	11,081,947	12,075,582	4,068,942
Amount	5,515,951,417	843,230,145	740,240,745	660,717,630	1,181,052,691	2,090,710,208
Total tax credits [7]: Number	44,356,918	22,619,094	8,355,127	5,791,632	5,669,340	1,921,725
Amount	57,607,446	17,189,011	12,792,588	9,553,320	6,698,175	11,374,351
Child tax credit: Number	25,703,043	12,598,245	6,048,897	4,006,880	3,047,469	1,552
Amount	31,397,124	10,618,648	9,702,683	6,838,537	4,235,640	1,618
Child and dependent care credit: Number	6,426,905	2,499,862	1,348,301	1,048,375	1,246,694	283,673
Amount	3,414,073	1,340,897	699,620	559,173	663,130	151,252
Earned income credit [8]: Number	23,116,759	23,116,759	0	0	0	0
Amount	44,651,224	44,651,224	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	20,269,683	20,269,683	0	0	0	0
Amount	39,288,715	39,288,715	0	0	0	0
Alternative minimum tax: Number	4,117,686	136,844	91,375	138,007	1,119,368	2,632,092
Amount	21,882,067	227,990	121,509	214,864	2,225,213	19,092,489
Income tax [10]: Number	94,923,083	50,167,709	17,686,249	10,952,074	12,049,174	4,067,877
Amount	1,023,644,566	87,500,155	94,333,682	90,809,591	209,236,819	541,764,320
Total tax liability [11]: Number	102,804,110	57,684,273	17,976,437	11,006,133	12,067,172	4,070,095
Amount	1,077,216,641	105,242,088	101,232,148	96,458,249	219,837,055	554,447,100
Tax due at time of filing [12]: Number	26,490,216	12,608,280	4,440,970	2,830,270	4,444,621	2,166,075
Amount	123,972,295	12,735,912	9,309,005	8,077,280	22,263,394	71,586,705
Overpayments [13]: Number	107,741,733	77,753,263	13,814,663	7,939,418	7,026,054	1,208,335
Amount	254,207,653	137,216,420	39,127,616	27,751,748	31,394,098	18,717,771

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
ALABAMA						
Number of returns	2,028,820	1,457,595	249,302	145,238	136,882	39,803
Number of joint returns	786,207	335,005	170,255	123,132	122,597	35,218
Number with paid preparer's signature	1,317,861	945,694	162,958	90,804	85,306	33,099
Number of exemptions	4,144,059	2,623,740	616,143	398,763	390,015	115,398
Adjusted gross income (AGI) [3]	96,623,613	28,210,470	15,308,946	12,523,671	17,925,475	22,655,051
Salaries and wages in AGI [4]: Number	1,716,939	1,206,806	222,529	131,153	123,224	33,227
Amount	67,707,148	24,084,206	12,212,267	9,861,755	13,149,464	8,399,456
Taxable interest: Number	710,590	335,186	130,489	97,334	109,877	37,704
Amount	2,250,059	561,425	248,855	209,399	358,241	872,138
Ordinary dividends: Number	322,964	127,459	54,425	45,783	65,363	29,934
Amount	1,866,168	223,178	138,748	136,084	335,258	1,032,902
Business or profession net income (less loss):						
Number	323,289	211,463	43,424	27,343	29,253	11,806
Amount	2,874,119	828,915	312,003	273,968	615,916	843,316
Number of farm returns	52,616	26,588	9,874	6,558	6,626	2,970
Net capital gain (less loss) in AGI: Number	265,434	101,169	42,552	36,193	55,800	29,720
Amount	6,748,358	255,492	178,809	214,592	709,778	5,389,688
Taxable Individual Retirement Arrangements distributions: Number	125,354	65,590	23,033	15,492	16,361	4,878
Amount	1,477,199	417,174	254,162	231,920	372,303	201,639
Pensions and annuities in AGI: Number	371,873	212,827	65,344	42,050	41,906	9,746
Amount	6,801,519	2,591,807	1,362,977	1,074,159	1,358,082	414,495
Unemployment compensation: Number	87,045	67,343	11,410	5,039	2,956	297
Amount	184,211	137,668	25,044	12,340	8,128	1,031
Social Security benefits in AGI: Number	207,562	104,281	45,979	25,859	23,455	7,988
Amount	2,002,919	454,001	571,028	409,618	410,468	157,802
Self-employment retirement plans: Number	9,413	1,128	894	930	2,906	3,555
Amount	162,097	5,168	6,663	8,215	41,182	100,870
Total itemized deductions [6]: Number	625,030	238,834	131,704	100,864	116,101	37,527
Amount	12,745,373	3,305,882	2,181,700	1,881,839	2,816,718	2,559,234
State and local income taxes: Number	520,541	170,739	114,801	91,369	108,028	35,604
Amount	2,158,962	255,688	300,503	316,435	562,714	723,621
State and local general sales taxes: Number	92,019	57,349	15,836	9,099	7,840	1,895
Amount	135,210	58,530	25,562	18,142	21,236	11,740
Real estate taxes: Number	517,888	165,078	113,374	93,326	110,382	35,728
Amount	567,731	110,085	84,990	82,980	150,863	138,810
Taxes paid: Number	624,566	237,516	132,062	101,130	116,287	37,571
Amount	3,018,894	468,974	441,389	443,740	771,747	893,046
Mortgage Interest paid: Number	509,163	168,927	112,927	91,375	104,814	31,120
Amount	4,524,047	1,074,603	815,588	755,994	1,085,075	792,786
Contributions: Number	551,314	194,002	117,672	93,302	110,108	36,230
Amount	2,950,792	532,690	438,677	410,155	666,654	902,617
Taxable income: Number	1,488,165	918,255	248,425	145,023	136,725	39,737
Amount	64,224,871	11,856,374	10,010,349	8,883,123	13,617,304	19,857,721
Total tax credits [7]: Number	640,669	376,412	114,449	74,701	58,909	16,198
Amount	727,659	291,652	182,619	127,132	69,494	56,761
Child tax credit: Number	409,411	230,650	88,471	55,206	35,078	6
Amount	464,369	184,918	139,602	91,880	47,967	3
Child and dependent care credit: Number	105,919	50,337	22,933	16,468	14,100	2,081
Amount	54,952	26,669	11,469	8,515	7,206	1,094
Earned income credit [8]: Number	509,995	509,995	0	0	0	0
Amount	1,140,075	1,140,074	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	466,886	466,886	0	0	0	0
Amount	1,033,731	1,033,730	0	0	0	0
Alternative minimum tax: Number	23,864	428	905	1,046	5,010	16,475
Amount	118,494	1,522	1,272	2,120	12,369	101,210
Income tax [10]: Number	1,271,634	710,537	240,546	144,227	136,585	39,739
Amount	10,979,024	1,150,092	1,225,887	1,195,823	2,392,685	5,014,536
Total tax liability [11]: Number	1,396,451	832,335	243,067	144,587	136,696	39,766
Amount	11,617,995	1,389,669	1,311,144	1,264,095	2,512,948	5,140,140
Tax due at time of filing [12]: Number	338,373	159,373	59,711	39,102	57,470	22,717
Amount	1,618,281	158,364	123,444	110,866	296,423	929,185
Overpayments [13]: Number	1,637,891	1,267,867	184,419	102,231	72,823	10,551
Amount	3,943,294	2,633,990	500,922	332,131	287,212	189,040

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
ALASKA						
Number of returns	341,329	219,088	48,438	31,218	34,850	7,735
Number of joint returns	123,623	36,825	26,359	23,849	29,987	6,603
Number with paid preparer's signature	161,292	95,972	23,914	16,111	19,378	5,917
Number of exemptions	625,663	309,215	114,063	83,993	97,237	21,155
Adjusted gross income (AGI) [3]	17,947,050	4,154,442	2,986,904	2,699,476	4,558,417	3,547,811
Salaries and wages in AGI [4]: Number	286,658	176,155	43,609	28,442	31,951	6,501
Amount	12,671,329	3,502,833	2,368,953	2,100,105	3,364,289	1,335,149
Taxable interest: Number	160,089	71,852	29,111	22,484	29,191	7,451
Amount	326,143	61,665	37,264	35,104	69,809	122,302
Ordinary dividends: Number	86,988	39,850	13,971	11,175	16,386	5,606
Amount	314,114	51,935	29,224	29,105	63,460	140,389
Business or profession net income (less loss):						
Number	56,697	28,581	9,720	7,245	8,611	2,540
Amount	795,312	140,049	94,523	94,651	203,651	262,438
Number of farm returns	1,293	437	210	208	293	145
Net capital gain (less loss) in AGI: Number	60,225	22,326	9,679	8,526	14,021	5,673
Amount	1,013,114	46,884	34,501	47,580	169,837	714,311
Taxable Individual Retirement Arrangements distributions: Number	14,962	5,081	3,211	2,577	3,273	820
Amount	228,607	35,151	34,766	38,872	74,716	45,101
Pensions and annuities in AGI: Number	51,539	19,435	10,492	8,406	11,055	2,151
Amount	1,270,856	259,210	257,510	247,076	408,468	98,593
Unemployment compensation [5]: Number	76,271	61,906	8,225	3,837	2,203	100
Amount	143,242	106,701	20,491	9,731	5,944	375
Social Security benefits in AGI: Number	23,090	8,184	5,716	3,917	4,087	1,186
Amount	236,904	38,472	64,184	53,126	59,960	21,163
Self-employment retirement plans: Number	3,641	555	429	539	1,187	931
Amount	58,696	3,847	3,637	5,151	18,281	27,780
Total itemized deductions [6]: Number	91,537	23,017	20,517	17,565	24,535	5,903
Amount	1,750,666	335,597	341,202	317,768	526,542	229,557
State and local income taxes: Number	15,548	3,072	3,165	2,990	4,996	1,325
Amount	23,998	2,320	2,523	2,460	5,370	11,324
State and local general sales taxes: Number	24,924	5,574	5,550	5,207	7,148	1,445
Amount	32,611	3,049	13,832	4,622	8,049	3,058
Real estate taxes: Number	82,298	18,597	18,322	16,260	23,385	5,734
Amount	281,851	46,401	51,315	51,332	92,100	40,703
Taxes paid: Number	88,081	20,904	19,740	17,212	24,318	5,907
Amount	354,008	54,216	72,146	60,933	109,697	57,018
Mortgage Interest paid: Number	82,482	18,975	18,707	16,435	23,133	5,232
Amount	897,567	161,496	179,236	174,835	279,687	102,315
Contributions: Number	70,837	14,644	15,265	14,045	21,391	5,492
Amount	286,758	32,065	42,433	45,992	89,383	76,884
Taxable income: Number	292,146	170,117	48,274	31,186	34,837	7,732
Amount	13,062,167	2,171,109	2,048,157	1,977,310	3,612,789	3,252,801
Total tax credits [7]: Number	113,348	57,163	21,838	15,942	15,112	3,293
Amount	126,138	39,530	35,030	27,205	17,456	6,916
Child tax credit: Number	73,254	35,781	16,820	11,852	8,790	11
Amount	90,165	26,913	28,996	21,476	12,765	15
Child and dependent care credit: Number	13,772	5,082	2,910	2,509	2,851	420
Amount	7,175	2,350	1,587	1,394	1,610	235
Earned income credit [8]: Number	42,178	42,178	0	0	0	0
Amount	68,790	68,790	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	36,405	36,405	0	0	0	0
Amount	61,351	61,352	0	0	0	0
Alternative minimum tax: Number	3,469	99	125	179	859	2,207
Amount	13,926	202	259	313	1,973	11,178
Income tax [10]: Number	268,648	148,995	46,211	30,918	34,793	7,731
Amount	2,262,567	236,202	272,170	281,158	653,012	820,025
Total tax liability [11]: Number	280,988	160,553	46,883	31,012	34,808	7,732
Amount	2,405,429	274,628	293,275	300,911	688,904	847,710
Tax due at time of filing [12]: Number	86,777	47,873	11,646	8,689	14,466	4,103
Amount	290,010	34,385	27,374	26,738	73,377	128,135
Overpayments [13]: Number	241,966	163,983	35,705	21,535	18,678	2,065
Amount	559,170	286,336	98,570	72,706	74,741	26,816

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
ARIZONA						
Number of returns	2,596,639	1,745,224	353,823	205,608	219,124	72,860
Number of joint returns	1,036,640	417,286	214,429	159,810	184,043	61,072
Number with paid preparer's signature	1,522,584	999,209	208,318	119,894	136,360	58,803
Number of exemptions	5,492,421	3,276,961	863,348	545,865	602,017	204,230
Adjusted gross income (AGI) [3]	147,978,344	36,324,979	21,732,603	17,738,595	29,006,963	43,175,204
Salaries and wages in AGI: [4] Number	2,182,258	1,445,157	306,513	179,261	191,368	59,959
Amount	97,961,641	31,584,856	16,765,792	13,329,737	20,546,171	15,735,086
Taxable interest: Number	1,118,402	512,182	206,228	147,022	183,780	69,190
Amount	4,179,248	868,552	416,817	344,844	674,659	1,874,377
Ordinary dividends: Number	550,818	221,787	92,819	73,528	109,581	53,103
Amount	3,260,435	470,337	291,469	263,403	587,333	1,647,895
Business or profession net income (less loss): Number	379,295	215,328	57,356	38,495	48,240	19,876
Amount	4,440,597	1,035,922	533,561	466,523	1,020,473	1,384,117
Number of farm returns	8,223	3,822	1,210	960	1,255	976
Net capital gain (less loss) in AGI: Number	494,987	193,533	79,681	64,139	102,273	55,361
Amount	15,214,819	518,312	349,943	439,710	1,564,177	12,342,676
Taxable Individual Retirement Arrangements distributions: Number	194,102	96,765	36,672	25,150	27,373	8,142
Amount	2,655,185	675,150	450,144	429,172	716,670	384,048
Pensions and annuities in AGI: Number	469,292	245,269	88,838	57,773	61,298	16,114
Amount	9,267,030	2,934,064	1,919,785	1,569,207	2,125,638	718,336
Unemployment compensation: Number	73,088	55,449	9,462	4,313	3,370	494
Amount	219,383	164,454	28,511	13,196	11,061	2,160
Social Security benefits in AGI: Number	287,414	124,787	68,127	40,551	39,922	14,027
Amount	3,053,232	585,436	867,208	649,869	690,311	260,407
Self-employment retirement plans: Number	17,739	2,740	1,967	2,154	5,359	5,519
Amount	319,560	18,535	16,938	23,422	86,046	174,619
Total itemized deductions: [6] Number	1,007,519	360,021	221,139	160,136	196,378	69,845
Amount	24,264,291	5,254,002	4,210,834	3,498,274	5,592,763	5,708,418
State and local income taxes: Number	718,192	194,567	161,484	127,567	170,466	64,108
Amount	3,663,554	213,812	327,986	371,466	876,309	1,873,984
State and local general sales taxes: Number	271,689	149,192	58,710	32,279	25,781	5,727
Amount	484,710	153,832	114,250	80,129	89,455	47,044
Real estate taxes: Number	903,620	298,928	199,781	149,923	187,637	67,351
Amount	1,821,354	453,882	317,516	263,015	440,811	346,130
Taxes paid: Number	1,009,164	359,777	221,966	160,640	196,807	69,974
Amount	6,419,093	929,531	847,526	791,918	1,519,904	2,330,214
Mortgage interest paid: [7] Number	884,222	296,010	199,110	147,524	180,477	61,101
Amount	11,251,045	3,042,312	2,195,862	1,602,652	2,691,068	1,719,152
Contributions: Number	836,419	259,036	186,103	142,474	182,449	66,357
Amount	3,261,912	434,646	424,610	398,963	720,453	1,283,241
Taxable income: Number	2,034,757	1,188,283	350,419	204,847	218,538	72,670
Amount	100,255,128	16,281,280	13,570,495	12,013,816	21,230,716	37,158,820
Total tax credits: [8] Number	866,497	478,053	160,371	103,567	94,841	29,665
Amount	958,355	359,572	248,186	170,067	110,607	69,924
Child tax credit: Number	541,836	297,166	119,708	73,081	51,831	50
Amount	652,796	250,360	198,942	129,084	74,365	43
Child and dependent care credit: Number	108,089	41,754	24,415	18,473	19,376	4,071
Amount	55,965	21,136	12,564	9,810	10,266	2,190
Earned income credit: [9] Number	426,022	426,022	0	0	0	0
Amount	817,955	817,955	0	0	0	0
Excess earned income credit (refundable): [10] Number	378,916	378,916	0	0	0	0
Amount	734,461	734,461	0	0	0	0
Alternative minimum tax: Number	51,028	594	1,515	1,781	10,507	36,631
Amount	274,655	2,313	2,308	3,362	24,737	241,934
Income tax: [11] Number	1,756,630	935,570	328,624	201,736	218,015	72,685
Amount	17,982,915	1,650,776	1,695,900	1,638,136	3,716,962	9,281,140
Total tax liability: [12] Number	1,883,758	1,054,272	335,316	203,031	218,405	72,734
Amount	18,857,253	1,937,739	1,817,947	1,739,635	3,900,608	9,461,325
Tax due at time of filing: [13] Number	536,617	249,896	95,440	61,000	90,879	39,402
Amount	2,534,009	242,592	195,593	172,461	467,315	1,456,049
Overpayments: [14] Number	1,974,466	1,448,055	249,605	137,887	117,066	21,853
Amount	4,643,973	2,613,707	682,461	454,630	521,043	372,131

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
ARKANSAS						
Number of returns	1,184,565	875,057	148,076	76,213	65,910	19,309
Number of joint returns	503,801	249,996	110,981	66,577	59,190	17,057
Number with paid preparer's signature	774,502	565,426	97,926	49,494	44,945	16,711
Number of exemptions	2,437,054	1,614,719	376,066	207,343	184,422	54,504
Adjusted gross income (AGI) [3]	50,651,815	16,751,019	9,070,197	6,551,020	8,612,664	9,666,915
Salaries and wages in AGI: [4] Number	1,000,116	726,942	131,264	67,621	58,109	16,180
Amount	36,182,688	14,306,558	7,088,272	4,974,817	5,991,953	3,821,090
Taxable interest: Number	433,874	226,720	81,618	52,832	54,328	18,376
Amount	1,334,163	396,922	171,663	127,485	201,305	436,789
Ordinary dividends: Number	201,751	90,628	36,586	26,491	33,530	14,516
Amount	1,462,740	140,660	80,614	72,395	155,885	1,013,185
Business or profession net income (less loss): Number	194,494	130,652	27,685	15,141	15,027	5,989
Amount	1,614,848	618,633	208,225	149,253	286,881	351,855
Number of farm returns	47,276	27,779	8,501	4,753	4,377	1,866
Net capital gain (less loss) in AGI: Number	173,760	77,306	30,460	22,162	29,443	14,389
Amount	2,800,725	208,576	137,006	150,001	412,055	1,893,085
Taxable Individual Retirement Arrangements distributions: Number	80,416	44,957	15,135	9,256	8,665	2,403
Amount	914,133	292,568	172,039	143,731	208,229	97,567
Pensions and annuities in AGI: Number	204,339	123,539	37,224	21,449	18,164	3,963
Amount	3,335,452	1,366,882	721,424	524,476	565,598	157,072
Unemployment compensation: Number	71,236	56,795	9,606	3,161	1,528	146
Amount	211,677	163,237	30,360	10,967	6,454	659
Social Security benefits in AGI: Number	124,140	61,580	29,716	15,565	13,080	4,199
Amount	1,186,293	266,614	364,827	247,016	226,463	81,371
Self-employment retirement plans: Number	4,338	727	524	481	1,340	1,266
Amount	66,313	3,796	3,563	4,718	19,521	34,715
Total itemized deductions: [6] Number	300,183	106,486	66,871	51,334	57,162	18,330
Amount	6,291,065	1,573,383	1,081,435	942,364	1,400,170	1,293,713
State and local income taxes: Number	247,763	70,043	58,271	47,580	54,320	17,549
Amount	1,441,768	125,231	182,028	208,081	390,385	536,042
State and local general sales taxes: Number	48,372	32,814	8,357	3,687	2,749	765
Amount	85,286	39,438	17,377	9,796	9,869	8,807
Real estate taxes: Number	246,674	75,418	55,626	46,027	52,765	16,838
Amount	300,228	62,084	49,179	48,767	82,612	57,587
Taxes paid: Number	300,172	106,154	67,045	51,424	57,212	18,337
Amount	1,912,595	248,458	264,604	282,054	504,082	613,396
Mortgage Interest paid: [7] Number	238,366	74,248	55,532	44,895	49,298	14,393
Amount	1,929,140	488,350	362,079	328,689	452,977	297,043
Contributions: Number	246,653	76,947	55,504	44,679	52,198	17,325
Amount	1,302,167	221,777	206,982	189,895	299,009	384,505
Taxable income: Number	865,726	556,847	147,649	76,114	65,836	19,280
Amount	32,621,554	7,216,615	5,959,084	4,671,607	6,518,061	8,256,188
Total tax credits: [8] Number	361,211	220,737	68,109	37,799	27,617	6,949
Amount	380,244	164,232	108,422	61,907	31,975	13,709
Child tax credit: Number	238,188	141,181	52,893	27,678	16,424	12
Amount	272,564	117,264	86,235	46,490	22,563	12
Child and dependent care credit: Number	53,436	23,756	13,700	8,321	6,589	1,070
Amount	26,217	11,503	6,707	4,194	3,293	519
Earned income credit: [9] Number	289,410	289,410	0	0	0	0
Amount	596,389	596,389	0	0	0	0
Excess earned income credit (refundable): [10] Number	259,887	259,887	0	0	0	0
Amount	536,577	536,577	0	0	0	0
Alternative minimum tax: Number	16,828	307	546	525	3,369	12,081
Amount	79,280	1,131	936	1,008	7,922	68,283
Income tax: [11] Number	743,218	439,341	143,083	75,736	65,773	19,285
Amount	5,432,649	707,046	717,777	624,904	1,138,577	2,244,345
Total tax liability: [12] Number	821,367	515,810	144,532	75,910	65,822	19,293
Amount	5,789,859	865,482	772,254	663,243	1,198,212	2,290,669
Tax due at time of filing: [13] Number	215,293	113,032	39,786	23,159	28,722	10,594
Amount	805,226	114,627	84,857	70,274	172,509	362,959
Overpayments: [14] Number	939,204	744,291	104,906	50,771	33,680	5,556
Amount	2,063,593	1,426,522	265,269	156,451	139,469	75,881

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
CALIFORNIA						
Number of returns	15,987,519	10,308,750	2,114,275	1,280,416	1,665,681	618,397
Number of joint returns	5,993,029	2,274,893	1,047,905	850,763	1,313,697	505,771
Number with paid preparer's signature	10,571,096	6,689,018	1,412,744	856,995	1,124,686	487,653
Number of exemptions	33,334,661	18,809,100	4,940,444	3,265,489	4,589,413	1,730,215
Adjusted gross income (AGI) [3]	1,035,151,862	199,744,646	129,917,545	110,727,522	224,507,913	370,254,236
Salaries and wages in AGI: [4] Number	13,277,537	8,318,572	1,838,367	1,124,852	1,482,585	513,161
Amount	699,104,678	177,834,425	103,067,783	86,281,337	170,385,445	161,535,689
Taxable interest: Number	7,455,321	3,102,163	1,331,314	980,617	1,451,269	589,958
Amount	32,231,174	5,936,842	2,815,311	2,460,761	5,220,100	15,798,161
Ordinary dividends: Number	3,465,496	1,216,039	529,747	443,837	813,050	462,823
Amount	25,838,720	2,728,561	1,604,570	1,567,009	3,956,046	15,982,533
Business or profession net income (less loss): Number	2,888,628	1,708,813	369,419	257,919	384,032	168,445
Amount	47,400,400	12,597,422	5,169,029	4,359,983	10,492,642	14,781,323
Number of farm returns	69,388	27,569	9,666	8,042	13,586	10,525
Net capital gain (less loss) in AGI: Number	3,127,443	1,076,602	450,404	384,596	745,775	470,066
Amount	107,772,840	3,200,930	1,590,416	1,962,887	7,911,937	93,106,669
Taxable Individual Retirement Arrangements distributions: Number	933,143	414,011	172,573	124,488	160,742	61,329
Amount	13,332,296	2,941,795	2,014,746	1,958,284	3,762,117	2,655,354
Pensions and annuities in AGI: Number	2,251,249	1,095,354	406,352	278,948	356,985	113,610
Amount	47,729,585	13,334,255	9,176,880	7,759,091	12,447,410	5,011,949
Unemployment compensation: Number	1,017,569	680,670	146,907	81,774	89,234	18,984
Amount	4,078,571	2,599,494	614,805	350,503	415,051	98,718
Social Security benefits in AGI: Number	1,425,080	551,633	321,683	207,498	241,077	103,189
Amount	16,876,237	3,333,795	3,937,815	3,130,163	4,527,620	1,946,843
Self-employment retirement plans: Number	205,374	29,542	21,673	22,865	63,957	67,337
Amount	4,038,034	205,915	216,301	267,029	1,077,162	2,271,626
Total itemized deductions: [6] Number	6,354,239	1,939,324	1,270,371	1,012,833	1,525,195	606,516
Amount	219,122,904	39,510,505	30,459,555	27,529,791	55,309,578	66,313,474
State and local income taxes: Number	5,022,184	1,075,935	1,023,506	895,628	1,441,800	585,315
Amount	50,631,879	1,736,356	2,948,987	3,848,849	11,154,616	30,943,071
State and local general sales taxes: Number	1,218,277	760,694	240,320	115,051	81,628	20,584
Amount	2,243,397	727,602	442,103	308,600	327,842	437,250
Real estate taxes: Number	5,291,369	1,454,477	1,046,999	858,480	1,370,830	560,583
Amount	22,911,201	4,368,409	3,346,274	3,121,611	6,570,902	5,504,006
Taxes paid: Number	6,351,083	1,932,327	1,272,206	1,013,926	1,525,995	606,629
Amount	91,969,102	8,949,087	7,177,443	7,665,276	20,522,386	47,654,911
Mortgage Interest paid: [7] Number	5,150,910	1,456,065	1,029,819	836,126	1,312,337	516,563
Amount	98,654,644	23,708,213	16,410,449	14,167,232	26,555,314	17,813,436
Contributions: Number	5,257,169	1,319,942	1,079,812	891,015	1,398,899	567,501
Amount	24,359,073	2,298,658	2,404,767	2,332,022	4,972,684	12,350,942
Taxable income: Number	12,285,682	6,686,055	2,057,113	1,267,598	1,658,592	616,324
Amount	694,897,680	89,912,847	77,467,247	70,294,868	153,214,680	304,008,041
Total tax credits: [8] Number	5,074,714	2,603,931	870,325	613,051	720,279	267,128
Amount	6,166,137	1,967,929	1,278,382	971,002	798,246	1,150,579
Child tax credit: Number	3,002,080	1,526,947	652,587	435,848	386,594	104
Amount	3,474,941	1,246,558	999,041	716,816	512,435	90
Child and dependent care credit: Number	722,283	252,067	137,709	111,524	172,763	48,220
Amount	413,964	144,428	79,635	65,754	98,628	25,518
Earned income credit: [9] Number	2,516,355	2,516,355	0	0	0	0
Amount	4,749,976	4,749,975	0	0	0	0
Excess earned income credit (refundable): [10] Number	2,126,679	2,126,679	0	0	0	0
Amount	4,006,272	4,006,272	0	0	0	0
Alternative minimum tax: Number	735,476	4,392	13,341	22,884	212,255	482,604
Amount	5,044,250	35,828	18,687	36,727	449,182	4,503,826
Income tax: [11] Number	10,721,317	5,313,975	1,903,894	1,234,290	1,652,175	616,983
Amount	137,232,470	9,267,686	10,237,033	9,999,653	27,321,598	80,406,502
Total tax liability: [12] Number	11,835,810	6,348,186	1,962,962	1,249,556	1,657,607	617,499
Amount	145,391,006	11,962,536	11,241,341	10,820,766	28,969,218	82,397,146
Tax due at time of filing: [13] Number	3,428,408	1,666,508	538,625	337,939	564,048	321,288
Amount	17,551,388	1,874,705	1,247,224	1,051,219	2,946,665	10,431,574
Overpayments: [14] Number	11,911,687	8,293,664	1,517,198	896,938	1,011,509	192,378
Amount	30,890,064	14,631,992	4,592,555	3,416,098	5,086,986	3,162,432

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
COLORADO						
Number of returns	2,228,867	1,402,143	320,915	199,221	230,906	75,682
Number of joint returns	912,360	304,508	189,487	155,291	198,162	64,912
Number with paid preparer's signature	1,182,403	711,998	175,525	107,215	129,415	58,250
Number of exemptions	4,413,221	2,274,351	748,050	524,643	649,227	216,950
Adjusted gross income (AGI) [3]	138,876,098	27,924,254	19,754,527	17,223,320	30,749,804	43,224,192
Salaries and wages in AGI [4]: Number	1,889,980	1,152,394	284,614	179,558	209,448	63,966
Amount	92,919,459	24,467,314	15,479,859	13,371,922	22,679,951	16,920,414
Taxable interest: Number	1,021,550	440,176	182,297	137,478	189,375	72,224
Amount	3,879,742	676,294	336,300	289,709	586,939	1,990,498
Ordinary dividends: Number	579,798	222,293	94,285	78,404	125,565	59,251
Amount	3,397,001	404,739	246,783	237,483	581,557	1,926,440
Business or profession net income (less loss):						
Number	399,093	214,068	63,516	43,688	55,481	22,340
Amount	4,721,454	1,159,422	622,863	524,141	1,111,335	1,303,693
Number of farm returns	31,287	15,692	5,241	3,577	4,376	2,401
Net capital gain (less loss) in AGI: Number	525,151	196,858	81,195	68,818	117,460	60,820
Amount	15,693,455	545,400	328,018	394,455	1,453,800	12,971,780
Taxable Individual Retirement Arrangements distributions: Number	162,061	75,090	31,593	22,197	25,513	7,668
Amount	2,171,671	513,793	357,560	351,392	607,780	341,145
Pensions and annuities in AGI: Number	375,104	178,234	72,570	49,998	58,782	15,520
Amount	7,838,876	2,195,617	1,634,642	1,360,204	2,018,737	629,677
Unemployment compensation: Number	69,316	46,036	11,621	6,052	4,944	663
Amount	258,904	165,947	44,690	24,211	20,974	3,082
Social Security benefits in AGI: Number	198,450	82,116	47,532	28,688	29,071	11,043
Amount	1,991,807	370,763	551,129	412,943	458,621	198,350
Self-employment retirement plans: Number	23,709	3,633	2,692	2,805	7,480	7,099
Amount	367,631	20,861	20,810	27,108	104,592	194,260
Total itemized deductions [6]: Number	939,766	297,199	205,155	157,247	207,653	72,512
Amount	22,524,741	4,790,556	3,722,063	3,294,499	5,556,428	5,161,194
State and local income taxes: Number	806,012	210,312	182,483	146,115	197,998	69,104
Amount	4,184,285	547,082	406,426	457,386	1,026,214	1,747,175
State and local general sales taxes: Number	115,936	71,165	21,256	10,700	9,416	3,399
Amount	182,506	67,083	33,012	23,029	28,701	30,681
Real estate taxes: Number	849,214	247,053	186,522	147,737	198,286	69,616
Amount	1,757,949	356,296	289,666	278,365	483,496	350,126
Taxes paid: Number	940,115	296,448	205,529	157,562	207,951	72,625
Amount	6,434,522	1,029,450	782,800	809,465	1,624,918	2,187,888
Mortgage Interest paid: Number	842,583	249,978	188,980	147,373	193,082	63,170
Amount	10,947,883	2,512,091	2,075,042	1,797,060	2,800,927	1,762,763
Contributions: Number	771,027	205,091	168,376	137,279	191,272	69,009
Amount	3,119,492	332,069	344,854	346,919	693,463	1,402,188
Taxable income: Number	1,785,799	962,122	318,781	198,719	230,598	75,579
Amount	98,768,996	13,708,527	12,604,944	11,816,443	22,839,906	37,799,174
Total tax credits [7]: Number	736,779	339,576	144,990	105,308	110,310	36,595
Amount	874,050	255,988	219,349	171,587	120,804	106,321
Child tax credit: Number	416,301	182,677	103,223	72,133	58,249	19
Amount	528,570	157,968	166,275	123,688	80,616	22
Child and dependent care credit: Number	101,142	30,985	22,452	18,930	23,662	5,113
Amount	51,165	15,877	11,207	9,719	11,859	2,505
Earned income credit [8]: Number	279,001	279,001	0	0	0	0
Amount	482,506	482,506	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	238,071	238,071	0	0	0	0
Amount	421,047	421,048	0	0	0	0
Alternative minimum tax: Number	52,903	546	807	1,133	9,411	41,006
Amount	276,130	1,744	1,337	2,267	22,158	248,623
Income tax [10]: Number	1,604,259	799,398	302,492	196,591	230,188	75,590
Amount	18,062,971	1,455,977	1,604,031	1,612,127	4,022,546	9,368,290
Total tax liability [11]: Number	1,718,442	906,689	308,144	197,498	230,483	75,628
Amount	19,016,733	1,749,610	1,741,662	1,725,310	4,230,850	9,569,301
Tax due at time of filing [12]: Number	501,557	226,680	83,773	56,408	93,978	40,718
Amount	2,478,687	233,931	177,732	158,415	467,587	1,441,021
Overpayments [13]: Number	1,638,902	1,128,438	228,667	136,170	124,286	21,341
Amount	3,683,397	1,814,565	597,302	432,158	520,886	318,486

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
CONNECTICUT						
Number of returns	1,714,027	996,449	246,883	164,327	216,014	90,354
Number of joint returns	651,493	151,414	117,496	120,528	183,165	78,890
Number with paid preparer's signature	989,712	542,173	148,826	98,682	130,733	69,298
Number of exemptions	3,206,428	1,365,261	520,973	422,967	617,743	279,484
Adjusted gross income (AGI) [3]	141,719,454	19,339,520	15,225,474	14,243,249	28,974,082	63,937,129
Salaries and wages in AGI [4]: Number	1,421,180	783,762	216,278	147,294	195,795	78,051
Amount	94,294,070	16,270,487	11,810,511	11,057,246	22,124,329	33,031,497
Taxable interest: Number	1,018,476	408,630	182,016	139,846	199,839	88,145
Amount	4,750,307	613,649	311,747	275,047	548,225	3,001,637
Ordinary dividends: Number	564,862	202,852	85,506	73,586	127,425	75,493
Amount	4,525,193	405,329	246,127	242,698	634,938	2,996,101
Business or profession net income (less loss):						
Number	263,231	119,366	39,856	31,783	47,621	24,605
Amount	5,722,333	906,157	561,817	529,389	1,352,274	2,372,695
Number of farm returns	3,123	1,255	517	422	567	362
Net capital gain (less loss) in AGI: Number	446,524	153,257	62,083	54,981	104,110	72,093
Amount	15,783,495	335,675	202,959	259,098	1,019,855	13,965,908
Taxable Individual Retirement Arrangements distributions: Number	154,661	72,635	27,517	20,133	24,749	9,627
Amount	2,061,699	443,291	289,617	294,648	555,564	478,579
Pensions and annuities in AGI: Number	311,490	148,677	55,145	39,895	50,740	17,033
Amount	6,108,910	1,638,127	1,140,829	994,833	1,589,755	745,365
Unemployment compensation: Number	113,728	70,469	18,584	12,052	10,638	1,985
Amount	472,388	271,263	82,753	54,662	51,678	12,032
Social Security benefits in AGI: Number	198,527	78,516	45,246	29,393	32,249	13,123
Amount	2,305,041	385,872	594,878	480,734	575,072	268,486
Self-employment retirement plans: Number	31,914	3,254	2,987	3,486	9,816	12,371
Amount	620,705	21,686	25,355	35,454	150,606	387,605
Total itemized deductions [6]: Number	774,848	194,622	156,067	132,494	202,574	89,091
Amount	22,749,368	3,237,830	2,827,407	2,826,607	5,629,344	8,228,179
State and local income taxes: Number	692,214	129,773	145,982	128,966	199,558	87,935
Amount	6,087,184	211,681	384,480	494,356	1,298,712	3,697,954
State and local general sales taxes: Number	69,281	52,779	9,307	3,305	2,794	1,096
Amount	65,935	31,043	11,463	6,074	7,820	9,537
Real estate taxes: Number	716,203	166,065	143,965	125,931	194,488	85,754
Amount	4,059,440	662,864	596,770	587,099	1,152,664	1,060,043
Taxes paid: Number	774,568	193,766	156,351	132,680	202,651	89,120
Amount	10,668,306	971,428	1,061,351	1,158,487	2,591,696	4,885,344
Mortgage interest paid: Number	638,503	141,334	130,118	114,957	176,077	76,017
Amount	7,891,206	1,252,082	1,175,516	1,136,725	2,121,872	2,205,011
Contributions: Number	676,735	144,493	135,042	120,245	190,830	86,125
Amount	2,819,296	199,628	225,834	236,396	518,760	1,638,678
Taxable income: Number	1,409,202	694,780	244,911	163,709	215,569	90,233
Amount	107,001,130	10,196,489	9,984,159	9,768,853	21,206,997	55,844,631
Total tax credits [7]: Number	569,382	221,825	103,101	88,113	108,924	47,419
Amount	749,202	164,899	139,465	135,042	108,388	201,407
Child tax credit: Number	289,142	108,701	67,918	57,126	55,382	15
Amount	370,781	95,990	104,566	95,532	74,677	16
Child and dependent care credit: Number	80,374	21,414	13,390	14,086	24,420	7,064
Amount	41,933	11,040	6,645	7,505	13,004	3,739
Earned income credit [8]: Number	176,930	176,930	0	0	0	0
Amount	302,202	302,203	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	151,314	151,314	0	0	0	0
Amount	267,654	267,654	0	0	0	0
Alternative minimum tax: Number	96,823	446	1,116	1,947	26,883	66,431
Amount	511,210	2,650	1,376	2,674	47,078	457,432
Income tax [10]: Number	1,306,189	602,926	235,493	162,180	215,317	90,273
Amount	23,161,751	1,129,675	1,352,641	1,363,593	3,778,166	15,537,676
Total tax liability [11]: Number	1,373,277	664,778	239,562	163,031	215,597	90,309
Amount	24,216,836	1,337,236	1,467,608	1,472,202	4,018,334	15,921,454
Tax due at time of filing [12]: Number	365,642	156,092	54,857	37,164	70,609	46,920
Amount	2,069,172	165,607	118,651	107,636	335,280	1,341,998
Overpayments [13]: Number	1,270,723	802,144	185,052	121,352	134,006	28,169
Amount	3,341,692	1,291,280	548,934	451,571	605,622	444,286

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
DELAWARE						
Number of returns	412,049	261,339	59,736	37,821	42,002	11,151
Number of joint returns	153,142	45,683	32,189	29,479	36,305	9,486
Number with paid preparer's signature	213,874	126,421	33,498	21,405	24,167	8,383
Number of exemptions	788,449	408,585	132,038	98,888	117,731	31,207
Adjusted gross income (AGI) [3]	24,150,367	5,480,009	3,678,595	3,269,665	5,535,191	6,186,906
Salaries and wages in AGI [4]: Number	351,627	217,157	52,604	33,960	38,397	9,509
Amount	16,766,888	4,486,795	2,811,097	2,505,974	4,167,675	2,795,347
Taxable interest: Number	190,270	81,776	35,546	27,205	35,101	10,642
Amount	533,394	124,538	68,448	57,334	102,877	180,196
Ordinary dividends: Number	104,492	39,497	18,048	14,954	22,978	9,015
Amount	680,030	71,729	49,209	50,245	119,656	389,191
Business or profession net income (less loss):						
Number	50,173	25,883	8,298	5,972	7,444	2,576
Amount	621,068	163,331	76,917	66,039	143,473	171,309
Number of farm returns	2,255	1,158	369	274	284	170
Net capital gain (less loss) in AGI: Number	78,850	28,061	12,691	10,952	18,485	8,661
Amount	1,808,078	58,675	45,041	58,347	210,088	1,435,929
Taxable Individual Retirement Arrangements distributions: Number	34,116	16,089	6,663	4,738	5,206	1,420
Amount	429,686	103,010	74,188	71,473	121,525	59,492
Pensions and annuities in AGI: Number	89,465	44,742	17,085	11,746	12,907	2,985
Amount	1,757,493	552,848	360,511	300,260	414,258	129,616
Unemployment compensation: Number	23,414	15,687	3,891	2,121	1,591	124
Amount	82,010	51,295	15,449	8,022	6,710	534
Social Security benefits in AGI: Number	51,318	22,224	12,199	7,488	7,175	2,232
Amount	566,373	106,568	161,388	126,374	128,699	43,345
Self-employment retirement plans: Number	2,903	385	310	343	916	949
Amount	46,911	2,396	2,141	3,063	12,795	26,517
Total itemized deductions [6]: Number	155,811	44,953	34,744	28,097	37,291	10,726
Amount	3,644,250	717,443	587,863	558,757	938,341	841,847
State and local income taxes: Number	146,859	38,116	33,701	27,620	36,874	10,548
Amount	834,295	56,188	86,427	103,311	233,899	354,470
State and local general sales taxes: Number	1,399	636	264	184	197	118
Amount	5,588	582	475	503	755	3,273
Real estate taxes: Number	138,891	36,316	30,906	26,035	35,379	10,255
Amount	266,868	46,514	44,771	43,840	79,190	52,552
Taxes paid: Number	154,593	43,803	34,679	28,099	37,283	10,729
Amount	1,119,907	106,294	133,946	149,735	316,923	413,008
Mortgage Interest paid: Number	137,839	37,342	31,356	25,963	34,140	9,038
Amount	1,535,200	321,305	303,983	277,675	414,661	217,576
Contributions: Number	133,529	33,474	29,532	25,231	35,014	10,278
Amount	547,977	62,665	68,253	68,615	128,465	219,980
Taxable income: Number	336,489	186,183	59,482	37,746	41,946	11,132
Amount	16,974,345	2,700,510	2,440,651	2,291,693	4,163,570	5,377,921
Total tax credits [7]: Number	137,417	65,468	25,583	19,971	20,788	5,607
Amount	153,402	51,109	36,985	31,301	21,739	12,267
Child tax credit: Number	77,937	36,277	17,588	13,350	10,715	7
Amount	96,042	31,154	27,908	22,350	14,624	6
Child and dependent care credit: Number	23,946	9,169	4,445	4,133	5,263	936
Amount	13,090	5,014	2,441	2,330	2,835	471
Earned income credit [8]: Number	60,491	60,491	0	0	0	0
Amount	112,117	112,117	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	53,938	53,938	0	0	0	0
Amount	101,983	101,983	0	0	0	0
Alternative minimum tax: Number	9,628	76	171	268	1,889	7,224
Amount	54,373	796	202	406	4,144	48,827
Income tax [10]: Number	303,481	155,462	57,473	37,487	41,921	11,138
Amount	3,008,775	287,199	320,604	316,050	733,936	1,350,984
Total tax liability [11]: Number	317,874	169,116	58,072	37,597	41,946	11,143
Amount	3,149,271	324,915	338,052	330,962	760,907	1,394,434
Tax due at time of filing [12]: Number	81,080	34,504	14,612	9,792	16,058	6,114
Amount	320,561	34,450	28,276	24,583	68,792	164,458
Overpayments [13]: Number	319,272	220,888	43,876	27,060	24,211	3,237
Amount	748,274	378,143	122,855	89,928	97,286	60,063

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
DISTRICT OF COLUMBIA						
Number of returns	287,723	183,071	40,558	21,274	27,921	14,899
Number of joint returns	45,035	11,028	5,803	5,329	12,487	10,388
Number with paid preparer's signature	151,054	95,772	19,157	10,119	14,944	11,062
Number of exemptions	458,309	278,899	60,840	32,959	50,880	34,731
Adjusted gross income (AGI) [3]	21,406,242	4,077,814	2,478,058	1,834,403	3,824,403	9,191,564
Salaries and wages in AGI [4]: Number	243,648	152,008	35,971	18,878	24,638	12,153
Amount	13,627,883	3,578,254	2,064,810	1,485,318	2,914,653	3,584,848
Taxable interest: Number	124,042	48,757	22,626	15,031	23,462	14,166
Amount	518,474	51,409	29,872	26,431	68,181	342,579
Ordinary dividends: Number	68,075	20,893	10,607	8,237	16,016	12,322
Amount	753,730	46,337	28,643	31,113	105,542	542,095
Business or profession net income (less loss):						
Number	44,166	24,127	5,771	3,604	6,174	4,490
Amount	813,765	97,299	52,457	52,252	167,065	444,692
Number of farm returns	272	55	28	25	65	99
Net capital gain (less loss) in AGI: Number	56,292	16,034	8,145	6,571	13,750	11,792
Amount	2,711,868	160,984	27,511	34,336	151,594	2,337,444
Taxable Individual Retirement Arrangements distributions: Number	11,668	4,099	2,040	1,513	2,453	1,563
Amount	162,527	23,855	17,856	17,147	41,954	61,715
Pensions and annuities in AGI: Number	46,198	24,582	7,650	4,328	6,188	3,450
Amount	1,272,493	419,626	225,853	156,679	273,237	197,098
Unemployment compensation: Number	9,780	8,199	874	328	303	76
Amount	37,647	31,513	3,313	1,290	1,227	305
Social Security benefits in AGI: Number	20,239	7,859	4,094	2,412	3,505	2,369
Amount	201,359	33,341	40,396	29,807	52,583	45,231
Self-employment retirement plans: Number	5,815	586	403	389	1,366	3,071
Amount	165,434	4,365	4,270	4,631	22,309	129,857
Total itemized deductions [6]: Number	122,257	39,093	24,526	17,759	26,175	14,704
Amount	3,906,361	609,295	469,533	382,557	819,553	1,625,423
State and local income taxes: Number	115,726	34,370	23,717	17,379	25,739	14,521
Amount	1,207,327	69,207	93,873	101,952	250,737	691,559
State and local general sales taxes: Number	4,104	2,767	567	285	333	152
Amount	5,251	1,646	644	423	1,597	940
Real estate taxes: Number	81,506	19,045	15,736	12,284	20,965	13,476
Amount	245,394	30,485	26,255	24,709	64,634	99,310
Taxes paid: Number	121,871	38,716	24,524	17,756	26,171	14,704
Amount	1,478,983	105,128	122,885	128,366	319,170	803,432
Mortgage Interest paid: Number	82,357	20,776	16,610	12,171	20,148	12,652
Amount	1,363,180	213,695	182,276	154,626	338,880	473,703
Contributions: Number	103,829	31,020	21,030	14,805	23,096	13,878
Amount	729,209	99,941	78,070	53,756	98,899	398,543
Taxable income: Number	238,103	134,076	40,172	21,171	27,814	14,870
Amount	15,647,190	2,167,689	1,715,769	1,319,163	2,829,589	7,614,981
Total tax credits [7]: Number	85,425	49,562	11,011	6,285	10,036	8,531
Amount	110,911	46,433	17,037	7,714	7,362	32,365
Child tax credit: Number	33,358	23,529	5,450	2,401	1,978	0
Amount	32,164	19,165	7,429	3,250	2,319	0
Child and dependent care credit: Number	14,173	8,647	1,766	797	1,632	1,331
Amount	8,907	5,634	1,090	489	917	779
Earned income credit [8]: Number	49,248	49,248	0	0	0	0
Amount	89,145	89,144	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	44,242	44,242	0	0	0	0
Amount	81,557	81,558	0	0	0	0
Alternative minimum tax: Number	15,017	88	298	394	3,089	11,148
Amount	100,811	871	261	626	7,389	91,664
Income tax [10]: Number	211,600	108,830	39,059	21,026	27,802	14,883
Amount	3,305,255	236,080	264,629	230,187	561,978	2,012,381
Total tax liability [11]: Number	223,191	119,951	39,388	21,103	27,855	14,894
Amount	3,499,501	266,512	278,024	241,673	593,159	2,120,134
Tax due at time of filing [12]: Number	60,502	27,966	10,560	5,555	9,265	7,156
Amount	310,800	29,760	21,067	16,748	45,851	197,372
Overpayments [13]: Number	216,267	150,574	29,236	15,077	16,959	4,421
Amount	565,652	291,868	81,066	51,780	80,018	60,921

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
FLORIDA						
Number of returns	8,656,007	6,101,173	1,062,199	592,424	634,995	265,216
Number of joint returns	3,087,379	1,269,388	626,656	453,657	521,488	216,190
Number with paid preparer's signature	5,085,548	3,503,037	613,304	343,256	402,657	223,294
Number of exemptions	16,244,764	9,971,822	2,394,031	1,491,266	1,684,881	702,764
Adjusted gross income (AGI) [3]	510,336,621	117,326,691	65,133,487	51,072,692	84,511,115	192,292,636
Salaries and wages in AGI [4]: Number	7,027,326	4,893,814	897,980	498,128	530,803	206,601
Amount	300,721,371	101,462,042	48,364,697	36,394,966	55,760,063	58,739,602
Taxable interest: Number	3,630,681	1,792,215	631,657	426,788	528,755	251,266
Amount	19,444,090	3,782,795	1,692,319	1,393,538	2,689,918	9,885,522
Ordinary dividends: Number	1,849,604	789,130	303,198	227,312	329,418	200,546
Amount	17,476,065	1,952,533	1,123,930	1,057,974	2,477,586	10,864,043
Business or profession net income (less loss):						
Number	1,441,375	985,338	164,740	101,782	124,893	64,622
Amount	14,825,745	4,959,273	1,473,015	1,158,728	2,487,057	4,747,671
Number of farm returns	38,021	15,929	5,834	4,506	6,229	5,523
Net capital gain (less loss) in AGI: Number	1,629,609	663,564	255,316	196,273	306,949	207,507
Amount	75,263,606	2,141,825	1,187,862	1,455,464	5,286,423	65,192,032
Taxable Individual Retirement Arrangements distributions: Number	696,101	344,196	126,334	86,012	98,021	41,538
Amount	10,524,535	2,326,227	1,524,934	1,468,092	2,753,520	2,451,763
Pensions and annuities in AGI: Number	1,562,363	844,746	283,335	179,855	189,667	64,760
Amount	31,334,881	10,055,971	6,328,210	5,042,679	6,846,652	3,061,369
Unemployment compensation: Number	248,654	184,384	32,480	16,054	13,338	2,398
Amount	754,815	540,485	103,180	53,679	47,809	9,662
Social Security benefits in AGI: Number	1,040,836	448,028	235,301	139,824	145,927	71,756
Amount	12,017,827	2,723,211	3,027,378	2,270,209	2,584,005	1,413,024
Self-employment retirement plans: Number	41,283	6,925	4,197	4,298	11,271	14,592
Amount	704,064	40,160	34,442	42,859	170,094	416,508
Total itemized deductions [6]: Number	2,912,255	1,213,555	578,108	389,825	501,447	229,320
Amount	72,045,418	20,114,508	11,457,620	8,645,420	13,934,844	17,893,025
State and local income taxes: Number	274,569	91,580	48,772	35,740	54,375	44,102
Amount	2,402,966	142,364	91,796	92,295	235,535	1,840,976
State and local general sales taxes: Number	2,100,558	791,433	426,772	301,015	402,830	178,508
Amount	3,171,669	681,119	518,457	444,226	780,983	746,883
Real estate taxes: Number	2,477,934	908,638	509,888	361,943	477,075	220,390
Amount	10,688,769	2,569,833	1,554,109	1,304,454	2,390,085	2,870,289
Taxes paid: Number	2,808,556	1,122,850	566,947	387,378	501,113	230,268
Amount	18,000,547	4,485,715	2,482,615	1,897,182	3,502,439	5,632,596
Mortgage Interest paid: Number	2,412,045	908,245	502,175	351,503	453,002	197,120
Amount	30,219,378	8,015,919	4,741,015	4,163,539	6,582,073	6,716,832
Contributions: Number	2,327,604	840,866	476,814	338,819	455,425	215,680
Amount	11,362,330	1,595,304	1,220,968	1,043,273	1,896,462	5,606,322
Taxable income: Number	6,579,635	4,040,060	1,051,973	589,852	633,047	264,703
Amount	369,139,448	54,057,178	41,763,330	35,610,137	63,827,325	173,881,478
Total tax credits [7]: Number	2,588,443	1,483,503	435,032	278,521	272,797	118,590
Amount	2,983,638	1,114,729	626,029	423,237	296,948	522,695
Child tax credit: Number	1,409,785	779,128	307,156	188,035	135,428	38
Amount	1,576,527	623,851	468,480	304,645	179,492	58
Child and dependent care credit: Number	421,534	198,289	85,495	60,231	63,602	13,917
Amount	226,552	103,951	45,124	33,580	35,703	8,193
Earned income credit [8]: Number	1,664,432	1,664,432	0	0	0	0
Amount	3,205,631	3,205,632	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	1,444,072	1,444,072	0	0	0	0
Amount	2,767,719	2,767,719	0	0	0	0
Alternative minimum tax: Number	168,866	2,660	5,111	6,721	39,322	115,052
Amount	984,031	15,577	7,763	11,974	92,944	855,773
Income tax [10]: Number	5,768,509	3,280,384	1,007,487	583,948	631,938	264,752
Amount	71,125,036	5,559,427	5,383,642	4,975,192	11,346,752	43,860,024
Total tax liability [11]: Number	6,366,527	3,860,144	1,022,026	586,527	632,930	264,900
Amount	73,879,554	6,718,098	5,710,146	5,222,831	11,777,446	44,451,032
Tax due at time of filing [12]: Number	1,629,872	802,236	266,298	168,675	252,617	140,046
Amount	10,076,175	802,614	568,967	503,697	1,463,236	6,737,661
Overpayments [13]: Number	6,704,196	5,126,453	764,801	399,991	340,639	72,312
Amount	16,830,091	9,815,044	2,297,087	1,500,949	1,718,394	1,498,617

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
GEORGIA						
Number of returns	4,075,882	2,827,826	507,678	296,277	332,579	111,522
Number of joint returns	1,492,974	573,834	301,835	233,568	286,292	97,445
Number with paid preparer's signature	2,459,341	1,709,697	298,962	168,856	194,187	87,639
Number of exemptions	8,531,180	5,226,707	1,221,332	799,229	951,882	332,030
Adjusted gross income (AGI) [3]	216,331,873	55,186,269	31,163,097	25,585,782	44,254,868	60,141,856
Salaries and wages in AGI [4]: Number	3,506,351	2,374,363	459,894	270,666	304,831	96,597
Amount	154,940,197	49,451,217	25,345,272	20,415,187	33,655,987	26,072,533
Taxable interest: Number	1,462,271	635,149	262,337	194,327	265,227	105,231
Amount	4,563,755	985,310	480,153	398,822	782,281	1,917,188
Ordinary dividends: Number	744,583	266,691	121,139	101,821	168,733	86,199
Amount	4,365,168	484,946	295,565	296,007	777,414	2,511,236
Business or profession net income (less loss):						
Number	760,554	499,754	96,232	60,892	74,120	29,556
Amount	5,660,586	1,324,076	616,667	532,276	1,293,023	1,894,545
Number of farm returns	49,432	22,624	8,469	6,083	7,646	4,610
Net capital gain (less loss) in AGI: Number	618,166	214,980	93,335	80,257	144,325	85,269
Amount	17,890,055	714,096	374,963	454,743	1,714,687	14,631,567
Taxable Individual Retirement Arrangements distributions: Number	225,246	106,994	42,362	29,610	35,055	11,225
Amount	3,019,607	731,365	488,014	462,774	840,683	496,772
Pensions and annuities in AGI: Number	650,350	340,404	120,279	79,321	87,846	22,500
Amount	12,192,594	3,915,886	2,437,080	1,996,064	2,915,317	928,248
Unemployment compensation: Number	162,868	120,299	22,367	10,920	8,323	959
Amount	457,412	327,688	63,843	34,347	27,864	3,672
Social Security benefits in AGI: Number	321,053	139,779	75,000	44,600	45,257	16,417
Amount	3,365,227	639,461	929,147	702,296	779,595	314,728
Self-employment retirement plans: Number	26,795	3,460	2,497	2,653	7,921	10,264
Amount	482,752	19,090	19,163	25,267	113,064	306,167
Total itemized deductions [6]: Number	1,607,918	599,707	343,688	245,439	310,434	108,650
Amount	37,406,505	9,283,012	6,232,037	5,131,402	8,656,735	8,103,319
State and local income taxes: Number	1,428,815	472,247	317,685	233,446	300,117	105,320
Amount	7,499,294	744,157	902,281	948,863	1,977,619	2,926,375
State and local general sales taxes: Number	146,714	99,031	23,224	11,343	9,883	3,233
Amount	219,816	89,140	40,793	27,389	30,941	31,553
Real estate taxes: Number	1,383,942	447,948	305,831	229,131	296,402	104,630
Amount	3,372,189	708,478	536,913	478,611	897,736	750,449
Taxes paid: Number	1,607,627	597,708	344,438	245,967	310,811	108,703
Amount	11,651,031	1,689,214	1,580,868	1,537,930	3,035,227	3,807,792
Mortgage Interest paid: Number	1,362,998	455,167	304,581	224,753	283,434	95,063
Amount	14,349,824	3,588,262	2,632,815	2,156,313	3,479,042	2,493,392
Contributions: Number	1,381,801	465,679	300,252	221,879	289,809	104,182
Amount	6,607,960	1,197,655	973,348	827,077	1,447,997	2,161,882
Taxable income: Number	3,040,377	1,796,655	504,708	295,581	332,065	111,368
Amount	143,872,127	23,262,426	19,494,694	17,336,085	32,287,272	51,491,650
Total tax credits [7]: Number	1,309,360	742,858	222,714	149,498	147,365	46,925
Amount	1,429,646	568,203	349,530	250,357	164,426	97,129
Child tax credit: Number	841,700	465,853	175,333	113,564	86,906	44
Amount	947,151	364,725	275,349	189,608	117,441	30
Child and dependent care credit: Number	230,222	107,664	45,268	33,813	36,215	7,262
Amount	122,082	58,017	23,456	17,877	18,970	3,761
Earned income credit [8]: Number	935,580	935,580	0	0	0	0
Amount	2,009,930	2,009,929	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	848,094	848,094	0	0	0	0
Amount	1,797,837	1,797,837	0	0	0	0
Alternative minimum tax: Number	102,159	1,046	2,419	3,130	22,704	72,860
Amount	483,393	4,257	3,261	5,278	47,520	423,077
Income tax [10]: Number	2,582,412	1,366,297	480,433	292,688	331,601	111,393
Amount	25,885,124	2,287,768	2,439,210	2,353,648	5,691,790	13,112,707
Total tax liability [11]: Number	2,865,752	1,640,107	488,320	293,886	331,998	111,441
Amount	27,317,573	2,825,696	2,616,581	2,493,750	5,954,001	13,427,545
Tax due at time of filing [12]: Number	757,255	359,755	123,116	80,208	131,982	62,194
Amount	3,649,039	382,269	262,662	227,101	667,174	2,109,832
Overpayments [13]: Number	3,206,771	2,400,770	376,255	209,360	187,324	33,062
Amount	7,969,093	4,974,557	1,061,083	691,998	799,994	441,461

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
HAWAII	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	638,212	428,128	89,844	53,086	53,052	14,102
Number of joint returns	239,609	90,081	51,853	41,216	45,152	11,307
Number with paid preparer's signature	357,356	227,578	53,078	31,921	33,363	11,416
Number of exemptions	1,198,076	664,115	209,987	141,789	145,794	36,391
Adjusted gross income (AGI) [3]	33,030,898	8,760,477	5,524,817	4,583,027	6,935,128	7,227,449
Salaries and wages in AGI [4]: Number	525,731	344,524	77,429	46,379	46,255	11,144
Amount	22,287,296	7,463,858	4,239,205	3,426,142	4,775,064	2,383,031
Taxable interest: Number	350,071	178,592	65,361	44,264	48,269	13,585
Amount	795,572	183,329	98,297	82,708	143,442	287,797
Ordinary dividends: Number	155,818	63,996	28,484	22,091	30,351	10,896
Amount	718,955	106,868	69,539	64,648	146,664	331,235
Business or profession net income (less loss):						
Number	97,340	54,344	15,360	10,493	12,427	4,716
Amount	1,420,478	301,576	157,979	139,458	341,740	479,726
Number of farm returns	5,709	3,124	972	599	688	326
Net capital gain (less loss) in AGI: Number	125,759	49,819	21,963	17,260	25,768	10,949
Amount	3,122,347	96,868	75,918	92,972	352,998	2,503,589
Taxable Individual Retirement Arrangements distributions: Number	44,956	20,987	9,096	6,180	6,869	1,824
Amount	508,106	121,071	88,938	83,022	138,735	76,339
Pensions and annuities in AGI: Number	121,589	62,489	22,552	15,456	17,018	4,074
Amount	2,637,375	798,607	551,431	466,168	631,899	189,270
Unemployment compensation: Number	22,525	14,394	4,345	2,207	1,441	138
Amount	85,664	55,516	16,030	7,932	5,461	724
Social Security benefits in AGI: Number	68,711	27,854	16,729	10,370	10,452	3,306
Amount	752,473	130,484	205,851	165,151	185,948	65,036
Self-employment retirement plans: Number	6,872	1,260	842	888	2,128	1,754
Amount	118,191	8,093	7,786	9,838	35,436	57,038
Total itemized deductions [6]: Number	214,498	70,663	47,945	37,558	45,013	13,319
Amount	5,307,127	1,165,658	951,630	874,111	1,343,155	972,573
State and local income taxes: Number	186,354	53,725	42,989	34,715	42,311	12,614
Amount	1,193,189	115,261	157,303	174,115	338,722	407,788
State and local general sales taxes: Number	23,198	13,068	4,370	2,594	2,491	675
Amount	32,227	7,935	5,056	4,028	6,078	9,129
Real estate taxes: Number	164,563	45,116	36,241	31,056	39,968	12,182
Amount	279,619	56,562	47,207	46,271	79,159	50,419
Taxes paid: Number	214,424	70,283	48,091	37,649	45,064	13,337
Amount	1,527,874	185,359	213,562	227,851	428,485	472,617
Mortgage Interest paid: Number	163,939	45,953	36,864	31,401	38,834	10,887
Amount	2,541,731	588,428	498,239	461,212	662,641	331,212
Contributions: Number	180,602	52,848	41,103	33,313	41,115	12,223
Amount	687,464	99,519	93,212	85,332	135,409	273,990
Taxable income: Number	506,578	297,986	88,766	52,849	52,906	14,071
Amount	22,392,378	4,355,389	3,530,943	3,090,272	5,034,930	6,380,844
Total tax credits [7]: Number	197,368	100,874	38,238	27,228	24,692	6,336
Amount	228,944	73,865	59,402	45,285	28,933	21,461
Child tax credit: Number	111,307	51,227	28,011	19,002	13,067	**
Amount	141,125	46,005	44,693	32,321	18,106	**
Child and dependent care credit: Number	29,519	9,226	6,977	5,838	6,453	1,025
Amount	13,481	4,120	3,197	2,678	2,968	518
Earned income credit [8]: Number	88,957	88,957	0	0	0	0
Amount	150,912	150,911	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	76,091	76,091	0	0	0	0
Amount	135,092	135,091	0	0	0	0
Alternative minimum tax: Number	13,428	169	319	439	3,140	9,361
Amount	76,970	946	427	869	7,430	67,298
Income tax [10]: Number	456,580	253,645	84,114	51,970	52,781	14,070
Amount	3,769,398	472,813	456,962	422,520	872,191	1,544,912
Total tax liability [11]: Number	484,618	279,785	85,572	52,303	52,874	14,084
Amount	3,999,852	544,837	488,748	449,644	926,127	1,590,496
Tax due at time of filing [12]: Number	129,262	59,129	24,818	16,052	22,609	6,654
Amount	456,047	57,302	47,655	41,483	109,361	200,246
Overpayments [13]: Number	479,992	354,553	61,649	34,359	25,729	3,702
Amount	995,385	561,606	161,502	107,571	114,236	50,472

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
IDAHO						
Number of returns	641,026	446,588	91,467	47,756	41,394	13,821
Number of joint returns	307,002	144,516	71,445	41,967	37,005	12,069
Number with paid preparer's signature	360,097	237,112	54,384	28,707	27,758	12,136
Number of exemptions	1,369,192	812,248	254,800	139,387	122,131	40,626
Adjusted gross income (AGI) [3]	31,708,725	8,416,529	5,607,499	4,103,220	5,427,034	8,154,444
Salaries and wages in AGI [4]: Number	540,420	369,668	81,341	42,487	36,071	10,853
Amount	20,846,011	7,532,373	4,373,333	3,099,120	3,569,263	2,271,922
Taxable interest: Number	271,489	138,983	51,637	33,388	34,288	13,193
Amount	911,089	264,400	96,702	76,107	139,323	334,558
Ordinary dividends: Number	130,627	59,177	23,394	17,117	21,086	9,853
Amount	594,396	102,973	57,526	49,672	104,430	279,794
Business or profession net income (less loss):						
Number	115,880	70,253	20,060	11,074	10,413	4,080
Amount	1,078,234	281,416	166,190	119,201	225,825	285,603
Number of farm returns	21,933	12,174	3,926	2,322	2,237	1,274
Net capital gain (less loss) in AGI: Number	129,236	57,250	22,389	16,705	21,834	11,058
Amount	3,746,914	210,739	126,312	141,499	443,767	2,824,598
Taxable Individual Retirement Arrangements distributions: Number	44,749	24,828	8,511	5,152	4,754	1,504
Amount	521,557	163,637	98,453	80,166	113,320	65,983
Pensions and annuities in AGI: Number	108,757	63,286	20,581	11,847	10,383	2,660
Amount	1,892,142	740,726	424,937	301,717	333,891	90,872
Unemployment compensation: Number	43,695	32,704	7,252	2,341	1,247	151
Amount	116,435	83,214	20,745	7,346	4,545	584
Social Security benefits in AGI: Number	63,168	30,277	15,009	7,855	7,149	2,878
Amount	612,589	131,733	185,457	124,065	120,697	50,637
Self-employment retirement plans: Number	4,426	773	582	563	1,273	1,235
Amount	70,904	4,350	4,640	5,342	20,012	36,562
Total itemized deductions [6]: Number	228,245	85,160	55,556	37,665	37,153	12,711
Amount	5,047,446	1,361,474	960,019	750,813	995,675	979,465
State and local income taxes: Number	188,213	56,167	49,490	35,460	35,188	11,908
Amount	1,098,688	101,283	145,408	154,780	259,916	437,304
State and local general sales taxes: Number	36,792	26,006	5,904	2,152	1,916	814
Amount	43,806	20,337	9,023	4,206	4,589	5,652
Real estate taxes: Number	206,393	72,335	51,124	35,451	35,452	12,031
Amount	437,597	134,198	78,563	65,519	93,137	66,179
Taxes paid: Number	228,567	85,154	55,723	37,742	37,204	12,744
Amount	1,596,355	260,508	236,423	226,952	360,632	511,840
Mortgage Interest paid: Number	198,223	69,812	50,320	34,352	33,199	10,540
Amount	1,932,858	547,969	430,260	318,801	381,523	254,306
Contributions: Number	186,088	60,036	46,381	33,404	34,282	11,985
Amount	861,016	141,267	148,296	125,235	180,245	265,973
Taxable income: Number	492,372	298,588	90,987	47,663	41,331	13,803
Amount	21,164,717	3,842,109	3,459,318	2,790,590	3,987,926	7,084,775
Total tax credits [7]: Number	217,645	117,569	48,400	26,585	19,637	5,454
Amount	258,547	88,209	80,028	46,571	24,654	19,084
Child tax credit: Number	135,847	68,381	37,030	19,053	11,358	25
Amount	179,250	60,371	64,564	36,196	18,086	34
Child and dependent care credit: Number	28,679	11,586	8,409	4,575	3,479	630
Amount	13,386	5,122	4,007	2,262	1,698	298
Earned income credit [8]: Number	106,991	106,991	0	0	0	0
Amount	196,083	196,083	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	92,592	92,592	0	0	0	0
Amount	171,082	171,082	0	0	0	0
Alternative minimum tax: Number	12,623	137	202	345	2,781	9,158
Amount	71,547	462	312	666	6,039	64,068
Income tax [10]: Number	425,237	239,286	84,083	46,873	41,190	13,805
Amount	3,488,498	371,537	388,904	354,685	671,202	1,702,171
Total tax liability [11]: Number	465,285	276,667	86,332	47,200	41,273	13,813
Amount	3,738,524	462,338	428,229	383,105	715,262	1,749,589
Tax due at time of filing [12]: Number	137,824	68,891	26,110	15,094	19,024	8,705
Amount	743,010	70,105	55,863	47,559	122,871	446,610
Overpayments [13]: Number	483,238	366,010	63,243	31,137	19,944	2,904
Amount	962,808	580,580	155,089	92,883	84,659	49,595

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
ILLINOIS						
Number of returns	5,979,694	3,855,445	843,391	514,540	572,474	193,844
Number of joint returns	2,239,136	732,308	462,309	392,291	485,991	166,237
Number with paid preparer's signature	3,587,879	2,255,251	523,429	314,109	347,626	147,464
Number of exemptions	11,905,826	6,298,369	1,971,790	1,389,007	1,660,707	585,953
Adjusted gross income (AGI) [3]	362,235,603	75,009,056	51,915,735	44,448,740	75,895,156	114,966,917
Salaries and wages in AGI [4]: Number	5,042,698	3,127,789	754,622	467,852	524,244	168,191
Amount	250,722,889	63,607,946	41,495,329	35,318,259	58,376,695	51,924,661
Taxable interest: Number	2,922,324	1,331,468	526,382	387,597	491,205	185,672
Amount	10,371,946	2,173,597	1,042,287	886,274	1,638,249	4,631,538
Ordinary dividends: Number	1,550,558	608,021	253,277	210,464	321,139	157,657
Amount	9,215,622	1,068,318	662,164	634,219	1,497,159	5,353,761
Business or profession net income (less loss):						
Number	867,251	501,669	123,743	85,573	108,420	47,846
Amount	9,724,446	2,145,814	1,073,556	947,604	2,185,704	3,371,767
Number of farm returns	71,875	34,959	14,680	9,915	8,912	3,409
Net capital gain (less loss) in AGI: Number	1,244,862	466,580	191,533	163,409	270,197	153,143
Amount	32,967,233	1,283,843	646,101	765,460	2,622,071	27,649,759
Taxable Individual Retirement Arrangements distributions: Number	468,487	238,223	84,751	57,889	65,650	21,974
Amount	6,065,499	1,532,279	972,824	909,010	1,575,987	1,075,398
Pensions and annuities in AGI: Number	1,060,845	565,379	192,403	126,284	138,748	38,031
Amount	19,820,864	6,247,388	3,991,813	3,224,022	4,726,142	1,631,500
Unemployment compensation: Number	326,659	206,338	59,656	32,250	25,010	3,405
Amount	1,386,560	857,337	261,528	138,273	111,418	18,004
Social Security benefits in AGI: Number	586,363	259,748	136,604	80,980	79,304	29,727
Amount	6,079,929	1,200,399	1,716,198	1,250,382	1,319,712	593,236
Self-employment retirement plans: Number	51,390	5,699	4,653	5,618	15,080	20,340
Amount	969,640	31,469	35,846	49,736	206,562	646,026
Total itemized deductions [6]: Number	2,193,569	667,611	474,187	369,592	497,003	185,176
Amount	51,576,335	10,509,832	8,490,033	7,535,810	12,886,011	12,154,647
State and local income taxes: Number	1,817,659	461,408	401,579	324,511	453,565	176,596
Amount	7,379,736	530,700	735,765	817,918	1,769,547	3,525,806
State and local general sales taxes: Number	346,031	180,588	69,862	44,133	42,824	8,624
Amount	548,901	175,454	114,125	92,578	117,823	48,922
Real estate taxes: Number	1,990,256	555,645	428,144	349,877	478,118	178,472
Amount	9,723,900	1,913,092	1,593,557	1,548,084	2,749,982	1,919,184
Taxes paid: Number	2,200,182	669,805	476,058	370,827	498,008	185,484
Amount	20,510,573	3,075,536	2,496,519	2,501,151	6,726,199	5,711,169
Mortgage Interest paid: Number	1,843,658	500,540	407,514	332,239	447,306	156,059
Amount	21,571,318	5,263,516	3,967,430	3,245,312	5,337,826	3,757,236
Contributions: Number	1,859,825	483,265	402,546	331,184	464,848	177,982
Amount	7,512,134	877,916	916,757	861,671	1,665,882	3,189,908
Taxable income: Number	4,642,439	2,524,986	838,564	513,472	571,769	193,648
Amount	258,738,126	35,234,566	33,851,007	30,987,547	56,855,793	101,809,212
Total tax credits [7]: Number	1,966,320	929,329	381,246	279,223	280,981	95,541
Amount	2,491,358	713,766	573,187	459,374	301,373	443,659
Child tax credit: Number	1,109,119	498,225	268,483	189,489	152,847	75
Amount	1,401,869	418,604	434,342	331,172	217,683	69
Child and dependent care credit: Number	273,635	110,993	54,372	41,810	53,944	12,516
Amount	153,209	65,465	30,218	22,487	28,298	6,742
Earned income credit [8]: Number	894,550	894,550	0	0	0	0
Amount	1,747,619	1,747,618	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	784,727	784,727	0	0	0	0
Amount	1,529,279	1,529,278	0	0	0	0
Alternative minimum tax: Number	160,305	1,371	3,403	4,899	38,410	112,222
Amount	694,797	4,283	4,019	6,963	69,508	610,025
Income tax [10]: Number	4,138,642	2,066,471	799,066	508,428	571,010	193,667
Amount	48,970,055	3,686,528	4,389,987	4,276,882	10,129,420	26,487,240
Total tax liability [11]: Number	4,460,741	2,374,668	810,387	510,378	571,574	193,734
Amount	51,147,723	4,365,900	4,650,915	4,497,382	10,546,800	27,086,728
Tax due at time of filing [12]: Number	1,077,732	490,738	173,668	115,786	197,787	99,753
Amount	5,138,744	471,795	354,668	320,100	907,461	3,084,519
Overpayments [13]: Number	4,690,039	3,248,979	649,708	383,525	347,373	60,454
Amount	11,698,862	5,825,845	1,992,210	1,426,087	1,561,841	892,880

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
INDIANA						
Number of returns	2,969,013	2,022,825	430,184	249,011	214,465	52,528
Number of joint returns	1,227,051	470,071	301,795	214,652	193,977	46,556
Number with paid preparer's signature	1,710,443	1,138,548	257,662	144,802	127,560	41,871
Number of exemptions	5,950,132	3,346,545	1,099,202	709,648	635,032	159,705
Adjusted gross income (AGI) [3]	142,501,220	39,463,403	26,507,039	21,452,325	27,742,748	27,335,705
Salaries and wages in AGI [4]: Number	2,531,088	1,657,411	396,304	232,487	199,189	45,697
Amount	104,505,176	32,643,963	21,719,793	17,623,835	21,414,381	11,103,205
Taxable interest: Number	1,288,238	644,297	242,226	173,489	177,734	50,492
Amount	3,049,028	936,611	391,587	301,848	476,909	942,073
Ordinary dividends: Number	607,884	269,560	108,184	84,464	104,847	40,829
Amount	2,514,143	420,609	248,043	221,236	462,843	1,161,414
Business or profession net income (less loss):						
Number	382,968	215,212	68,504	42,909	42,181	14,162
Amount	3,941,333	1,136,739	547,367	432,563	849,019	975,645
Number of farm returns	57,102	30,188	11,614	7,121	6,188	1,991
Net capital gain (less loss) in AGI: Number	491,394	211,844	84,341	66,507	88,647	40,055
Amount	7,823,427	486,211	315,119	358,062	953,344	5,710,691
Taxable Individual Retirement Arrangements distributions: Number	238,806	136,771	43,084	27,364	25,476	6,111
Amount	2,666,687	830,867	502,792	442,294	624,241	266,492
Pensions and annuities in AGI: Number	587,418	364,229	97,787	60,104	54,253	11,045
Amount	8,423,371	3,731,404	1,671,947	1,195,325	1,407,312	417,382
Unemployment compensation: Number	184,115	123,476	35,059	16,404	8,690	486
Amount	635,115	422,337	123,301	56,480	30,861	2,136
Social Security benefits in AGI: Number	290,829	148,228	67,489	36,133	30,086	8,893
Amount	2,891,232	670,536	886,279	604,002	547,950	182,464
Self-employment retirement plans: Number	16,443	2,153	1,634	1,879	5,029	5,748
Amount	263,536	10,586	10,971	14,921	67,012	160,047
Total itemized deductions [6]: Number	911,095	286,534	216,447	172,990	184,788	50,336
Amount	17,772,743	3,988,820	3,314,946	3,098,360	4,205,617	3,165,000
State and local income taxes: Number	868,519	253,937	211,788	170,599	182,550	49,645
Amount	3,764,265	394,334	562,728	625,619	1,016,364	1,165,221
State and local general sales taxes: Number	38,072	27,558	4,854	2,618	2,331	711
Amount	54,865	22,137	9,694	8,852	8,631	5,550
Real estate taxes: Number	835,152	242,826	200,345	165,065	178,316	48,600
Amount	1,761,850	357,818	325,350	316,782	474,177	287,724
Taxes paid: Number	913,439	287,294	217,242	173,459	185,044	50,400
Amount	6,196,121	1,008,789	950,415	1,004,647	1,572,008	1,660,262
Mortgage Interest paid: Number	795,288	228,082	196,130	160,958	168,605	41,513
Amount	6,557,895	1,475,734	1,426,270	1,287,179	1,596,260	772,451
Contributions: Number	738,413	195,911	173,886	149,742	170,616	48,258
Amount	2,948,499	392,742	436,781	435,784	716,833	966,358
Taxable income: Number	2,260,222	1,315,584	429,051	248,794	214,315	52,478
Amount	96,270,610	18,363,516	17,545,062	15,312,151	21,158,680	23,891,200
Total tax credits [7]: Number	948,073	472,814	210,258	138,028	102,649	24,324
Amount	1,117,226	359,716	338,916	237,522	120,144	60,927
Child tax credit: Number	597,841	277,085	159,219	99,889	61,617	31
Amount	785,274	248,004	268,967	177,489	90,789	26
Child and dependent care credit: Number	120,224	42,255	30,399	23,754	20,774	3,042
Amount	58,739	20,610	14,444	12,019	10,181	1,485
Earned income credit [8]: Number	459,366	459,366	0	0	0	0
Amount	852,437	852,436	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	408,601	408,601	0	0	0	0
Amount	769,876	769,876	0	0	0	0
Alternative minimum tax: Number	43,228	512	1,002	1,229	9,204	31,281
Amount	177,419	1,566	1,299	2,172	17,530	154,851
Income tax [10]: Number	2,023,250	1,096,734	412,767	247,214	214,056	52,479
Amount	15,908,786	1,904,252	2,138,356	2,035,237	3,693,554	6,137,389
Total tax liability [11]: Number	2,147,036	1,215,007	417,495	247,813	214,221	52,500
Amount	16,756,095	2,182,173	2,274,251	2,142,223	3,868,297	6,289,151
Tax due at time of filing [12]: Number	453,355	210,213	85,210	53,551	76,128	28,253
Amount	1,806,032	195,397	165,135	142,231	361,970	941,300
Overpayments [13]: Number	2,435,075	1,764,315	337,055	189,625	128,910	15,170
Amount	5,287,029	2,935,626	944,049	652,742	528,701	225,910

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
IOWA	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	1,378,083	925,741	213,588	120,262	94,378	24,114
Number of joint returns	612,157	233,954	162,954	107,534	86,145	21,570
Number with paid preparer's signature	931,219	603,026	156,870	85,247	65,888	20,188
Number of exemptions	2,697,542	1,434,757	562,398	349,021	279,947	71,419
Adjusted gross income (AGI) [3]	66,192,610	18,642,627	13,156,507	10,338,356	12,230,834	11,824,285
Salaries and wages in AGI [4]: Number	1,160,718	753,228	192,249	109,658	84,711	20,872
Amount	47,217,820	15,202,709	10,309,668	8,027,802	8,683,890	4,993,751
Taxable interest: Number	726,356	375,924	146,139	96,497	84,369	23,427
Amount	1,817,576	610,912	270,979	200,883	291,329	443,474
Ordinary dividends: Number	371,658	172,007	70,978	52,754	56,280	19,639
Amount	1,320,128	255,730	153,311	137,980	264,126	508,980
Business or profession net income (less loss):						
Number	211,504	120,245	40,735	23,415	20,353	6,756
Amount	1,973,434	572,708	316,291	240,389	438,319	405,725
Number of farm returns	83,539	47,870	16,911	9,451	7,134	2,173
Net capital gain (less loss) in AGI: Number	314,559	145,555	57,726	43,129	48,830	19,319
Amount	3,605,945	340,477	233,294	255,837	594,334	2,182,002
Taxable Individual Retirement Arrangements distributions: Number	126,284	73,260	23,520	14,136	12,286	3,082
Amount	1,171,831	394,054	222,809	189,332	250,774	114,863
Pensions and annuities in AGI: Number	263,146	155,446	49,602	29,365	23,554	5,179
Amount	3,699,889	1,529,748	791,987	587,095	619,919	171,140
Unemployment compensation: Number	92,760	64,397	17,994	7,086	3,033	250
Amount	274,398	190,646	53,330	19,906	9,409	1,108
Social Security benefits in AGI: Number	162,907	82,827	38,628	20,392	16,358	4,702
Amount	1,596,062	369,056	499,971	338,237	293,952	94,846
Self-employment retirement plans: Number	11,975	1,991	1,838	1,966	3,708	2,472
Amount	150,630	9,919	12,390	16,953	49,461	61,907
Total itemized deductions [6]: Number	443,473	151,970	102,050	83,612	82,836	23,005
Amount	8,409,359	2,016,141	1,550,059	1,453,707	1,931,062	1,458,390
State and local income taxes: Number	391,411	109,501	96,642	81,441	81,323	22,504
Amount	1,947,158	172,515	270,642	331,355	550,543	622,102
State and local general sales taxes: Number	49,396	39,430	5,595	2,321	1,544	506
Amount	47,042	26,297	8,016	4,966	4,445	3,318
Real estate taxes: Number	400,714	125,254	94,237	79,935	79,397	21,891
Amount	927,182	207,246	179,860	179,953	238,381	121,742
Taxes paid: Number	444,315	152,042	102,449	83,862	82,930	23,032
Amount	3,037,012	429,351	481,869	540,462	823,117	762,212
Mortgage Interest paid: Number	349,532	100,450	86,428	74,277	70,828	17,549
Amount	2,627,702	578,273	575,922	547,939	627,000	298,570
Contributions: Number	372,097	110,074	85,924	75,419	78,395	22,285
Amount	1,311,058	194,924	188,940	193,208	312,545	421,441
Taxable income: Number	1,101,043	649,488	212,977	120,165	94,322	24,091
Amount	44,632,773	9,139,840	8,654,860	7,356,698	9,266,793	10,214,582
Total tax credits [7]: Number	481,051	237,248	112,088	70,562	48,960	12,193
Amount	566,943	174,682	186,299	125,601	58,730	21,629
Child tax credit: Number	267,769	113,596	79,315	47,747	27,098	13
Amount	370,251	105,561	136,504	87,402	40,777	7
Child and dependent care credit: Number	83,936	28,860	25,608	16,482	11,411	1,575
Amount	38,464	12,750	12,261	7,954	4,868	633
Earned income credit [8]: Number	181,921	181,921	0	0	0	0
Amount	313,054	313,054	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	156,486	156,486	0	0	0	0
Amount	277,278	277,278	0	0	0	0
Alternative minimum tax: Number	22,905	254	410	524	5,306	16,411
Amount	96,706	728	569	804	9,661	84,944
Income tax [10]: Number	993,660	551,949	204,080	119,339	94,203	24,089
Amount	7,105,899	943,959	1,005,323	940,458	1,584,468	2,631,690
Total tax liability [11]: Number	1,061,142	615,864	207,254	119,652	94,277	24,095
Amount	7,590,455	1,113,635	1,095,103	1,009,009	1,680,828	2,691,881
Tax due at time of filing [12]: Number	287,879	141,757	57,253	35,052	40,800	13,017
Amount	921,369	140,476	125,118	105,907	215,752	334,116
Overpayments [13]: Number	1,045,638	758,764	150,465	81,257	48,296	6,856
Amount	2,058,739	1,163,385	379,626	254,550	180,994	80,184

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
KANSAS						
Number of returns	1,289,274	867,521	181,856	107,430	103,222	29,245
Number of joint returns	559,493	217,818	130,243	92,466	92,833	26,133
Number with paid preparer's signature	768,668	498,666	114,545	66,350	65,252	23,855
Number of exemptions	2,581,854	1,413,515	470,316	304,481	304,958	88,584
Adjusted gross income (AGI) [3]	66,432,725	16,864,185	11,188,733	9,264,937	13,525,821	15,589,050
Salaries and wages in AGI [4]: Number	1,080,803	702,250	162,561	97,368	93,506	25,118
Amount	46,822,455	14,103,005	8,828,892	7,253,022	10,007,100	6,630,434
Taxable interest: Number	608,864	302,907	110,855	79,298	87,803	28,001
Amount	1,656,931	466,583	206,486	161,906	270,834	551,121
Ordinary dividends: Number	320,887	137,180	55,849	44,821	59,666	23,371
Amount	1,820,977	203,118	125,189	117,665	253,249	1,121,756
Business or profession net income (less loss):						
Number	194,753	104,498	34,886	22,342	23,875	9,152
Amount	2,167,529	500,033	290,576	238,251	501,152	637,518
Number of farm returns	61,566	34,651	11,874	7,004	5,953	2,084
Net capital gain (less loss) in AGI: Number	279,935	120,156	47,065	37,680	52,018	23,016
Amount	4,148,865	254,578	185,092	202,928	517,879	2,988,388
Taxable Individual Retirement Arrangements distributions: Number	116,502	64,348	21,236	13,771	13,428	3,719
Amount	1,264,119	375,458	227,257	209,621	307,663	144,119
Pensions and annuities in AGI: Number	238,498	135,591	42,665	27,115	27,127	6,000
Amount	3,576,830	1,351,108	731,930	568,735	723,743	201,314
Unemployment compensation: Number	51,099	35,937	8,525	3,885	2,491	261
Amount	166,206	113,588	28,065	13,765	9,645	1,142
Social Security benefits in AGI: Number	137,872	65,530	32,437	18,277	16,442	5,186
Amount	1,436,253	301,378	423,382	305,448	299,076	106,968
Self-employment retirement plans: Number	10,732	1,442	1,310	1,389	3,408	3,183
Amount	161,760	7,257	9,186	12,120	46,734	86,462
Total itemized deductions [6]: Number	403,496	118,744	88,084	76,399	91,926	28,343
Amount	8,785,076	1,729,388	1,392,734	1,381,443	2,198,847	2,082,663
State and local income taxes: Number	333,643	71,822	75,763	70,698	88,166	27,194
Amount	2,093,363	165,154	201,196	271,924	573,161	881,928
State and local general sales taxes: Number	65,670	42,981	12,196	5,642	3,720	1,131
Amount	118,868	47,144	23,092	14,441	15,461	18,731
Real estate taxes: Number	368,355	98,247	81,432	72,788	88,602	27,286
Amount	961,119	178,160	168,663	174,882	277,196	162,219
Taxes paid: Number	403,807	118,484	88,423	76,556	91,995	28,349
Amount	3,341,533	421,790	423,569	494,555	914,497	1,087,122
Mortgage Interest paid: Number	327,005	81,289	74,828	67,887	80,347	22,654
Amount	2,700,755	495,810	520,463	520,570	740,593	423,319
Contributions: Number	339,357	85,366	73,275	67,676	85,711	27,329
Amount	1,628,746	183,124	192,976	206,791	374,320	671,535
Taxable income: Number	1,000,377	579,464	181,242	107,309	103,144	29,218
Amount	45,483,476	7,935,889	7,347,582	6,566,000	10,213,913	13,420,093
Total tax credits [7]: Number	431,495	216,854	90,738	59,786	50,346	13,771
Amount	497,373	162,784	149,144	102,413	57,676	25,357
Child tax credit: Number	256,485	119,727	66,565	41,779	28,395	19
Amount	338,689	106,623	115,097	75,280	41,678	11
Child and dependent care credit: Number	65,270	23,008	17,440	12,235	10,834	1,753
Amount	31,408	10,650	8,587	6,196	5,139	835
Earned income credit [8]: Number	183,356	183,356	0	0	0	0
Amount	330,158	330,158	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	161,004	161,004	0	0	0	0
Amount	296,754	296,755	0	0	0	0
Alternative minimum tax: Number	27,609	293	436	607	6,152	20,121
Amount	135,268	1,060	733	1,053	11,547	120,874
Income tax [10]: Number	890,851	478,712	173,336	106,555	103,019	29,229
Amount	7,871,434	808,722	878,081	864,263	1,782,795	3,537,571
Total tax liability [11]: Number	949,518	534,318	176,044	106,826	103,098	29,232
Amount	8,341,747	952,993	953,355	924,702	1,885,005	3,625,690
Tax due at time of filing [12]: Number	256,909	121,573	47,327	29,829	41,833	16,347
Amount	1,115,084	121,248	104,058	92,418	222,069	575,291
Overpayments [13]: Number	990,272	722,669	129,690	74,050	55,922	7,941
Amount	1,991,538	1,123,194	325,984	227,515	216,114	98,731

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
KENTUCKY						
Number of returns	1,822,852	1,291,792	249,436	136,400	114,348	30,876
Number of joint returns	791,906	360,380	182,906	118,948	102,651	27,021
Number with paid preparer's signature	1,175,158	823,552	165,491	86,753	73,527	25,835
Number of exemptions	3,661,002	2,224,524	632,243	382,865	331,378	89,992
Adjusted gross income (AGI) [3]	82,558,702	25,089,764	15,329,091	11,731,529	14,848,683	15,559,635
Salaries and wages in AGI [4]: Number	1,554,873	1,073,567	226,263	125,298	103,690	26,055
Amount	59,555,896	21,007,832	12,242,365	9,298,843	10,793,527	6,213,329
Taxable interest: Number	717,659	363,091	137,443	93,665	94,005	29,455
Amount	1,851,339	586,192	248,288	182,764	291,132	542,964
Ordinary dividends: Number	323,609	140,431	57,710	44,601	56,921	23,946
Amount	1,665,235	231,635	140,035	131,788	306,101	855,678
Business or profession net income (less loss):						
Number	274,592	172,602	42,186	25,213	25,153	9,438
Amount	2,715,328	874,382	321,274	253,841	533,517	732,314
Number of farm returns	90,585	52,874	17,086	9,586	7,842	3,197
Net capital gain (less loss) in AGI: Number	299,845	136,621	51,023	38,019	50,327	23,855
Amount	4,779,702	389,286	220,842	222,562	626,447	3,320,564
Taxable Individual Retirement Arrangements distributions: Number	119,188	65,637	22,589	14,030	13,237	3,695
Amount	1,384,265	419,068	258,106	218,006	326,819	162,266
Pensions and annuities in AGI: Number	344,849	203,917	63,950	37,816	32,487	6,679
Amount	6,001,333	2,421,187	1,298,360	952,686	1,071,664	257,437
Unemployment compensation: Number	123,609	84,818	23,383	9,987	5,068	353
Amount	371,790	249,335	71,342	31,702	17,933	1,479
Social Security benefits in AGI: Number	171,565	87,410	41,063	20,614	16,942	5,536
Amount	1,572,734	370,199	494,960	313,769	286,686	107,120
Self-employment retirement plans: Number	10,007	1,274	1,034	1,134	3,228	3,337
Amount	163,854	6,749	7,233	10,406	46,798	92,667
Total itemized deductions [6]: Number	570,283	196,037	138,399	104,163	102,287	29,397
Amount	11,232,780	2,668,049	2,170,956	2,008,987	2,517,718	1,867,070
State and local income taxes: Number	513,936	156,527	130,170	99,822	98,974	28,443
Amount	2,980,068	344,247	497,207	618,890	781,934	737,790
State and local general sales taxes: Number	48,664	32,321	7,866	4,242	3,267	968
Amount	50,174	21,416	9,500	6,973	7,330	4,954
Real estate taxes: Number	510,941	161,018	126,085	98,360	97,644	27,834
Amount	864,014	190,995	168,284	154,439	215,525	134,770
Taxes paid: Number	572,010	196,595	139,001	104,485	102,478	29,451
Amount	4,070,641	596,421	712,635	815,611	1,047,409	898,564
Mortgage Interest paid: Number	482,958	151,206	122,869	95,028	90,536	23,319
Amount	3,830,231	940,876	851,226	731,410	859,888	446,829
Contributions: Number	475,296	142,700	116,019	92,752	95,664	28,161
Amount	1,836,108	284,594	290,645	277,925	428,638	554,305
Taxable income: Number	1,370,585	840,513	248,748	136,236	114,252	30,836
Amount	54,190,916	11,342,430	10,003,681	8,223,488	11,119,621	13,501,698
Total tax credits [7]: Number	566,064	302,646	120,759	74,629	54,107	13,923
Amount	636,154	223,803	187,974	124,291	62,960	37,127
Child tax credit: Number	357,181	177,300	92,559	55,061	32,242	19
Amount	441,146	154,148	148,572	92,893	45,519	14
Child and dependent care credit: Number	72,986	26,314	19,041	14,344	11,538	1,749
Amount	34,111	11,738	8,797	7,042	5,632	901
Earned income credit [8]: Number	361,063	361,063	0	0	0	0
Amount	677,301	677,302	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	319,740	319,740	0	0	0	0
Amount	603,575	603,574	0	0	0	0
Alternative minimum tax: Number	28,172	354	621	735	6,880	19,582
Amount	129,671	2,637	814	1,416	12,693	112,111
Income tax [10]: Number	1,220,901	699,950	240,566	135,423	114,116	30,846
Amount	8,772,812	1,157,791	1,203,589	1,080,268	1,922,738	3,408,427
Total tax liability [11]: Number	1,325,412	801,328	243,273	135,744	114,210	30,857
Amount	9,334,071	1,370,376	1,286,187	1,143,916	2,031,189	3,502,404
Tax due at time of filing [12]: Number	301,668	149,903	56,674	33,706	44,593	16,792
Amount	1,115,400	141,190	109,122	90,947	226,012	548,129
Overpayments [13]: Number	1,472,293	1,114,179	187,357	98,923	63,381	8,453
Amount	3,156,806	1,956,317	502,962	324,492	261,354	111,679

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
LOUISIANA						
Number of returns	1,894,724	1,364,028	227,299	131,958	128,979	42,460
Number of joint returns	671,975	269,490	146,131	107,868	112,447	36,039
Number with paid preparer's signature	1,190,590	845,187	141,242	82,200	85,409	36,552
Number of exemptions	3,871,359	2,447,046	563,702	366,108	373,010	121,493
Adjusted gross income (AGI) [3]	91,887,850	24,340,957	13,971,289	11,383,048	16,904,165	25,288,391
Salaries and wages in AGI [4]: Number	1,621,674	1,144,747	205,334	120,934	116,382	34,277
Amount	63,358,904	22,426,301	11,325,269	9,156,717	12,360,819	8,089,798
Taxable interest: Number	691,906	332,443	123,351	90,501	105,274	40,337
Amount	2,052,455	522,116	215,327	170,012	324,368	820,634
Ordinary dividends: Number	316,618	130,594	51,191	41,239	60,974	32,620
Amount	1,710,977	232,172	128,266	119,297	289,609	941,635
Business or profession net income (less loss):						
Number	317,864	204,281	41,080	26,626	30,697	15,180
Amount	3,803,977	909,136	341,643	304,005	777,178	1,472,014
Number of farm returns	29,880	14,027	5,354	3,949	4,325	2,225
Net capital gain (less loss) in AGI: Number	263,771	105,707	40,687	33,358	52,214	31,805
Amount	6,575,086	280,040	168,106	192,347	633,512	5,301,081
Taxable Individual Retirement Arrangements distributions: Number	106,813	54,965	19,658	12,981	14,287	4,922
Amount	1,344,836	386,948	238,982	211,144	333,700	174,061
Pensions and annuities in AGI: Number	305,639	177,625	51,982	32,894	34,019	9,119
Amount	5,200,775	2,145,630	1,024,321	743,533	957,752	329,539
Unemployment compensation: Number	98,525	74,597	12,262	6,271	4,698	697
Amount	266,355	200,144	33,549	17,590	13,071	2,002
Social Security benefits in AGI: Number	148,990	69,280	34,162	18,899	18,622	8,027
Amount	1,442,129	297,845	401,538	279,929	305,280	157,536
Self-employment retirement plans: Number	13,325	1,598	1,134	1,241	3,933	5,419
Amount	263,140	9,885	9,685	13,201	63,768	166,601
Total itemized deductions [6]: Number	460,091	160,147	93,355	72,318	95,822	38,449
Amount	11,780,016	3,188,492	1,870,058	1,558,978	2,514,499	2,647,990
State and local income taxes: Number	377,103	111,248	77,739	63,501	88,204	36,411
Amount	1,869,695	134,271	177,518	207,762	476,261	873,883
State and local general sales taxes: Number	75,916	42,309	15,132	8,791	7,637	2,047
Amount	179,807	57,578	39,257	29,035	32,610	21,327
Real estate taxes: Number	302,805	77,938	59,405	53,873	78,743	32,846
Amount	491,877	77,013	60,438	65,221	141,365	147,840
Taxes paid: Number	458,974	158,098	93,618	72,644	96,081	38,533
Amount	2,615,923	299,941	288,943	310,710	661,406	1,054,923
Mortgage Interest paid: Number	360,045	106,126	75,667	63,510	84,502	30,240
Amount	4,159,081	1,733,127	561,319	512,276	796,418	555,940
Contributions: Number	368,044	110,854	74,908	61,167	85,260	35,855
Amount	1,865,973	306,843	258,149	234,304	409,410	657,269
Taxable income: Number	1,360,963	835,550	224,440	130,849	127,972	42,152
Amount	63,389,686	10,796,056	9,145,190	8,102,987	12,913,795	22,431,658
Total tax credits [7]: Number	590,260	337,648	104,655	69,101	58,390	20,466
Amount	785,264	262,309	173,304	123,894	82,268	143,490
Child tax credit: Number	384,319	214,847	82,915	52,195	34,350	12
Amount	439,635	173,079	131,759	86,885	47,899	14
Child and dependent care credit: Number	86,114	36,468	18,678	14,300	14,251	2,417
Amount	44,807	18,927	9,637	7,488	7,464	1,291
Earned income credit [8]: Number	510,348	510,348	0	0	0	0
Amount	1,156,158	1,156,158	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	467,989	467,989	0	0	0	0
Amount	1,048,478	1,048,478	0	0	0	0
Alternative minimum tax: Number	32,537	1,525	1,864	1,960	7,732	19,456
Amount	138,936	7,288	2,843	3,546	17,147	108,112
Income tax [10]: Number	1,161,018	645,381	216,126	129,733	127,646	42,132
Amount	11,428,639	1,064,120	1,133,176	1,104,567	2,292,890	5,833,887
Total tax liability [11]: Number	1,287,545	767,527	219,144	130,441	128,138	42,295
Amount	12,154,920	1,312,603	1,215,498	1,172,680	2,431,848	6,022,290
Tax due at time of filing [12]: Number	311,506	154,218	52,606	33,263	49,601	21,818
Amount	1,634,714	162,744	119,846	104,784	293,566	953,774
Overpayments [13]: Number	1,521,051	1,176,748	168,993	94,229	70,726	10,355
Amount	3,963,605	2,588,616	505,316	347,387	326,638	195,649

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
MAINE						
Number of returns	633,971	443,237	91,794	48,167	39,344	11,429
Number of joint returns	264,824	111,622	67,339	41,700	34,405	9,758
Number with paid preparer's signature	325,262	210,495	52,574	27,573	24,941	9,679
Number of exemptions	1,168,190	669,741	225,413	131,432	109,742	31,862
Adjusted gross income (AGI) [3]	29,466,685	8,901,872	5,637,761	4,141,282	5,143,589	5,642,181
Salaries and wages in AGI [4]: Number	529,493	359,363	82,495	43,679	34,603	9,353
Amount	20,258,216	7,164,103	4,396,170	3,198,565	3,487,795	2,011,583
Taxable interest: Number	322,181	170,252	64,963	39,955	35,853	11,158
Amount	689,035	213,147	96,972	74,735	115,396	188,785
Ordinary dividends: Number	146,692	68,775	27,749	19,337	21,795	9,036
Amount	747,590	131,829	83,340	73,961	159,692	298,767
Business or profession net income (less loss):						
Number	116,409	73,725	19,243	10,361	9,604	3,476
Amount	1,307,418	483,231	204,295	141,448	242,523	235,921
Number of farm returns	4,630	2,801	802	433	408	186
Net capital gain (less loss) in AGI: Number	117,669	52,567	21,203	15,364	19,490	9,045
Amount	2,264,835	138,807	117,065	118,571	363,873	1,526,518
Taxable Individual Retirement Arrangements distributions: Number	51,368	29,581	9,541	5,489	5,259	1,498
Amount	562,743	177,547	102,229	82,711	128,905	71,351
Pensions and annuities in AGI: Number	112,605	66,228	21,499	12,160	10,313	2,405
Amount	1,923,574	787,060	433,423	289,909	318,329	94,853
Unemployment compensation: Number	33,397	25,723	4,836	1,762	979	97
Amount	106,919	78,659	16,571	6,882	4,327	479
Social Security benefits in AGI: Number	64,394	31,819	15,748	7,640	6,815	2,372
Amount	581,998	131,391	180,628	112,261	113,347	44,371
Self-employment retirement plans: Number	5,811	1,169	923	829	1,645	1,245
Amount	78,677	6,715	7,230	7,806	24,693	32,233
Total itemized deductions [6]: Number	203,628	69,548	49,526	37,116	36,379	11,059
Amount	4,313,475	1,041,747	818,481	706,457	939,287	807,504
State and local income taxes: Number	187,341	56,522	47,718	36,464	35,763	10,874
Amount	1,107,562	105,872	155,800	175,836	292,582	377,472
State and local general sales taxes: Number	13,835	10,597	1,796	658	597	187
Amount	13,059	5,749	2,113	1,218	1,275	2,706
Real estate taxes: Number	191,191	62,284	47,106	35,864	35,268	10,669
Amount	585,381	143,478	118,168	103,817	137,655	82,263
Taxes paid: Number	204,040	69,599	49,743	37,220	36,408	11,070
Amount	1,789,926	272,990	294,634	298,369	452,406	471,527
Mortgage Interest paid: Number	173,322	55,979	43,886	33,460	31,303	8,694
Amount	1,484,384	399,445	341,628	274,752	309,720	158,838
Contributions: Number	164,496	47,583	40,482	32,408	33,467	10,556
Amount	487,182	60,038	65,026	60,681	99,338	202,100
Taxable income: Number	497,968	307,852	91,385	48,059	39,266	11,406
Amount	19,427,079	4,283,636	3,667,932	2,890,962	3,816,071	4,768,478
Total tax credits [7]: Number	200,222	102,195	44,766	27,177	20,146	5,938
Amount	216,066	72,194	66,511	42,977	21,311	13,072
Child tax credit: Number	106,352	49,478	30,053	17,085	9,732	4
Amount	134,301	44,293	48,022	28,490	13,495	3
Child and dependent care credit: Number	27,902	10,281	7,875	5,185	3,907	654
Amount	13,847	4,833	4,029	2,712	1,937	336
Earned income credit [8]: Number	90,254	90,254	0	0	0	0
Amount	151,148	151,148	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	74,530	74,530	0	0	0	0
Amount	127,170	127,169	0	0	0	0
Alternative minimum tax: Number	14,004	114	240	364	4,086	9,200
Amount	79,892	190	454	609	8,355	70,283
Income tax [10]: Number	452,321	265,563	88,369	47,759	39,215	11,415
Amount	3,090,195	451,312	439,244	376,046	651,239	1,172,355
Total tax liability [11]: Number	487,566	299,550	89,439	47,894	39,266	11,417
Amount	3,335,804	553,017	480,225	404,384	694,891	1,203,288
Tax due at time of filing [12]: Number	122,571	65,748	22,617	12,314	15,547	6,345
Amount	458,145	70,649	46,510	34,768	86,696	219,522
Overpayments [13]: Number	490,650	365,346	66,772	34,189	21,250	3,093
Amount	925,452	524,559	165,116	108,046	88,582	39,150

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
MARYLAND						
Number of returns	2,717,418	1,612,100	394,305	258,669	347,881	104,463
Number of joint returns	956,870	230,354	170,505	171,331	292,137	92,543
Number with paid preparer's signature	1,465,375	853,076	217,478	138,521	182,710	73,590
Number of exemptions	5,202,838	2,427,892	829,191	642,363	990,391	313,001
Adjusted gross income (AGI) [3]	181,096,029	34,292,563	24,275,677	22,407,026	46,781,244	53,339,520
Salaries and wages in AGI [4]: Number	2,328,347	1,332,813	349,487	233,623	320,581	91,843
Amount	129,329,942	29,291,054	19,468,023	17,939,668	37,024,234	25,606,963
Taxable interest: Number	1,390,926	531,715	251,868	200,335	306,119	100,889
Amount	3,933,447	667,465	390,301	346,862	756,209	1,772,611
Ordinary dividends: Number	673,040	218,037	102,191	93,123	177,097	82,592
Amount	4,026,245	398,242	282,682	298,742	831,245	2,215,334
Business or profession net income (less loss):						
Number	441,612	225,016	63,521	48,178	75,677	29,220
Amount	5,318,042	943,364	455,067	467,402	1,346,003	2,106,206
Number of farm returns	12,312	5,407	1,876	1,491	2,211	1,327
Net capital gain (less loss) in AGI: Number	547,590	169,413	77,714	72,624	148,538	79,301
Amount	12,969,895	404,083	258,517	328,371	1,350,235	10,628,688
Taxable Individual Retirement Arrangements distributions: Number	180,132	74,544	34,146	25,610	34,538	11,294
Amount	2,199,815	450,446	333,678	333,854	656,350	425,487
Pensions and annuities in AGI: Number	497,973	223,297	91,788	65,590	92,052	25,246
Amount	11,455,380	2,993,145	2,196,024	1,884,888	3,207,188	1,174,135
Unemployment compensation: Number	90,919	61,133	13,394	8,049	7,337	1,006
Amount	320,931	214,428	47,163	28,073	26,886	4,381
Social Security benefits in AGI: Number	268,488	103,215	62,342	40,243	46,595	16,093
Amount	2,914,434	487,963	747,914	593,778	767,541	317,239
Self-employment retirement plans: Number	32,702	3,138	2,445	3,163	10,663	13,293
Amount	628,612	18,939	20,879	30,528	145,526	412,740
Total itemized deductions [6]: Number	1,362,640	414,378	285,285	225,596	334,167	103,214
Amount	36,833,534	6,501,023	5,999,061	5,460,770	10,643,612	8,229,068
State and local income taxes: Number	1,293,451	361,136	277,606	221,935	330,731	102,043
Amount	9,848,601	812,334	1,097,721	1,247,023	2,961,019	3,730,504
State and local general sales taxes: Number	49,601	36,234	6,221	3,125	2,937	1,084
Amount	52,946	20,975	8,325	7,992	9,202	6,451
Real estate taxes: Number	1,129,344	275,318	236,554	202,194	315,640	99,638
Amount	3,681,231	626,926	592,135	578,942	1,183,937	699,292
Taxes paid: Number	1,361,533	412,330	285,719	225,915	334,324	103,245
Amount	14,034,751	1,799,944	1,723,033	1,852,490	4,188,882	4,470,402
Mortgage interest paid: Number	1,087,357	270,153	231,443	195,727	299,413	90,621
Amount	15,307,005	2,716,812	3,502,052	2,354,029	4,415,159	2,318,952
Contributions: Number	1,183,166	320,901	248,092	202,109	312,608	99,456
Amount	5,196,390	795,764	742,653	658,583	1,287,306	1,712,082
Taxable income: Number	2,231,659	1,133,162	389,412	257,509	347,261	104,315
Amount	122,972,477	16,147,272	14,869,917	14,580,206	32,802,379	44,572,704
Total tax credits [7]: Number	915,904	407,238	158,438	128,809	168,554	52,865
Amount	1,032,106	328,399	217,258	197,958	172,797	115,692
Child tax credit: Number	493,193	209,845	110,492	86,609	86,216	31
Amount	593,318	176,689	160,855	139,901	115,848	24
Child and dependent care credit: Number	176,775	65,696	28,967	25,287	45,817	11,008
Amount	104,620	40,909	16,840	14,774	26,142	5,955
Earned income credit [8]: Number	353,488	353,488	0	0	0	0
Amount	642,568	642,568	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	309,981	309,981	0	0	0	0
Amount	565,138	565,138	0	0	0	0
Alternative minimum tax: Number	127,303	657	2,845	4,561	36,990	82,250
Amount	618,016	2,970	3,257	6,314	66,220	539,253
Income tax [10]: Number	2,010,396	937,181	368,982	253,342	346,519	104,372
Amount	23,280,923	1,707,333	1,988,645	2,062,549	5,784,780	11,737,617
Total tax liability [11]: Number	2,134,506	1,052,216	375,829	255,025	347,028	104,408
Amount	24,383,354	1,977,412	2,105,737	2,169,877	6,032,274	12,098,054
Tax due at time of filing [12]: Number	542,638	228,819	84,188	57,428	117,733	54,470
Amount	2,419,249	219,632	161,351	142,084	462,643	1,433,538
Overpayments [13]: Number	2,085,751	1,338,884	302,444	194,805	216,205	33,413
Amount	5,330,287	2,351,951	906,217	709,038	938,697	424,383

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
MASSACHUSETTS						
Number of returns	3,144,359	1,897,859	446,457	289,613	373,915	136,515
Number of joint returns	1,154,828	295,349	217,487	211,091	313,355	117,546
Number with paid preparer's signature	1,809,988	1,030,036	270,122	177,939	228,941	102,950
Number of exemptions	5,734,450	2,557,451	938,584	747,016	1,076,805	414,594
Adjusted gross income (AGI) [3]	222,928,374	38,465,519	27,462,807	25,092,326	50,156,412	81,751,311
Salaries and wages in AGI [4]: Number	2,649,001	1,522,070	397,975	264,355	345,165	119,436
Amount	150,329,796	31,954,208	21,671,991	20,020,751	39,512,154	37,170,693
Taxable interest: Number	1,777,300	769,034	309,869	232,962	333,436	131,999
Amount	6,270,198	1,101,239	561,324	468,465	920,827	3,218,342
Ordinary dividends: Number	905,352	332,259	140,451	116,633	205,245	110,764
Amount	7,342,187	627,421	384,057	372,101	992,936	4,965,673
Business or profession net income (less loss):						
Number	481,643	233,909	73,058	54,770	81,393	38,513
Amount	8,634,613	1,762,865	1,000,204	890,049	2,102,020	2,879,474
Number of farm returns	4,494	2,001	719	547	738	489
Net capital gain (less loss) in AGI: Number	736,215	250,224	106,190	91,964	178,672	109,165
Amount	23,992,833	509,139	360,580	449,904	1,804,423	20,868,787
Taxable Individual Retirement Arrangements distributions: Number	256,599	127,943	45,600	31,234	38,001	13,821
Amount	3,306,932	789,660	509,100	485,480	899,368	623,323
Pensions and annuities in AGI: Number	535,468	279,436	94,523	62,705	74,896	23,908
Amount	9,925,645	3,222,612	1,974,907	1,538,158	2,230,332	959,635
Unemployment compensation: Number	196,737	117,576	34,428	21,383	19,714	3,636
Amount	1,028,943	548,483	201,947	125,311	125,870	27,332
Social Security benefits in AGI: Number	320,488	135,256	75,124	44,689	46,249	19,170
Amount	3,439,149	645,335	919,509	688,289	795,792	390,224
Self-employment retirement plans: Number	47,130	5,797	4,910	5,381	14,677	16,365
Amount	769,934	35,763	40,952	51,520	201,746	439,954
Total itemized deductions [6]: Number	1,316,185	354,393	260,112	223,025	344,751	133,904
Amount	35,041,627	5,757,585	4,756,218	4,712,493	9,416,157	10,399,175
State and local income taxes: Number	1,242,674	298,017	251,419	219,298	341,297	132,643
Amount	8,856,535	572,732	767,019	941,249	2,322,476	4,253,059
State and local general sales taxes: Number	59,644	43,592	7,993	3,601	3,259	1,199
Amount	49,810	20,692	8,041	5,456	7,822	7,800
Real estate taxes: Number	1,188,499	287,304	235,345	209,564	327,844	128,442
Amount	5,248,043	915,103	763,055	774,643	1,558,934	1,236,307
Taxes paid: Number	1,316,860	353,714	260,775	223,441	344,983	133,947
Amount	14,771,154	1,570,654	1,820,568	1,783,702	4,011,124	5,585,106
Mortgage Interest paid: Number	1,077,441	250,579	217,320	195,489	301,696	112,357
Amount	13,195,580	2,357,133	2,138,165	2,103,759	3,900,334	2,696,189
Contributions: Number	1,141,990	262,863	226,460	202,186	321,853	128,628
Amount	4,431,420	352,227	350,987	354,839	799,287	2,574,079
Taxable income: Number	2,572,348	1,330,558	443,414	288,755	373,271	136,350
Amount	163,702,110	20,216,199	18,204,886	17,325,500	36,938,930	71,016,596
Total tax credits [7]: Number	1,031,998	416,944	185,910	157,535	196,288	75,321
Amount	1,224,956	304,509	251,720	246,570	199,473	222,685
Child tax credit: Number	499,277	180,146	118,241	101,816	99,046	28
Amount	650,650	157,708	183,938	173,123	135,855	26
Child and dependent care credit: Number	143,801	38,324	23,384	24,992	43,849	13,252
Amount	72,892	19,400	11,276	12,613	22,729	6,874
Earned income credit [8]: Number	325,502	325,502	0	0	0	0
Amount	541,203	541,203	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	273,775	273,775	0	0	0	0
Amount	472,044	472,044	0	0	0	0
Alternative minimum tax: Number	143,615	649	1,550	2,845	37,828	100,743
Amount	762,349	2,441	2,188	4,545	69,375	683,798
Income tax [10]: Number	2,385,967	1,164,277	426,369	286,075	372,858	136,388
Amount	31,883,724	2,280,935	2,486,717	2,433,909	6,594,701	18,087,461
Total tax liability [11]: Number	2,510,670	1,280,617	433,076	287,316	373,229	136,432
Amount	33,377,663	2,651,512	2,674,916	2,599,936	6,935,228	18,516,070
Tax due at time of filing [12]: Number	646,905	278,989	102,632	67,045	125,930	72,309
Amount	3,318,321	287,917	211,644	185,505	581,629	2,051,626
Overpayments [13]: Number	2,371,449	1,554,860	332,357	213,477	229,886	40,869
Amount	5,793,942	2,390,873	981,852	799,692	1,057,144	564,381

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
MICHIGAN						
Number of returns	4,655,310	3,090,652	656,004	407,632	405,809	95,213
Number of joint returns	1,867,265	680,852	411,042	330,530	360,550	84,291
Number with paid preparer's signature	2,732,949	1,765,745	402,576	244,405	245,562	74,661
Number of exemptions	9,107,993	4,884,843	1,599,050	1,133,553	1,203,775	286,772
Adjusted gross income (AGI) [3]	233,372,609	57,627,182	40,462,881	35,195,977	53,019,990	47,066,577
Salaries and wages in AGI [4]: Number	3,849,956	2,425,416	591,457	373,899	375,478	83,706
Amount	168,173,966	45,069,974	31,709,739	27,916,928	41,264,062	22,213,263
Taxable interest: Number	2,204,639	1,086,079	395,269	294,125	338,278	90,888
Amount	6,031,011	1,621,995	714,988	596,204	1,014,653	2,083,170
Ordinary dividends: Number	1,119,216	488,334	192,011	155,046	208,530	75,295
Amount	5,306,990	805,518	478,202	434,405	924,829	2,664,035
Business or profession net income (less loss):						
Number	660,289	387,538	104,021	68,836	75,086	24,808
Amount	6,244,345	1,836,548	726,801	627,390	1,349,038	1,704,568
Number of farm returns	44,759	25,261	8,367	5,193	4,512	1,426
Net capital gain (less loss) in AGI: Number	901,971	384,418	148,892	121,345	174,814	72,502
Amount	11,805,643	675,947	482,988	545,808	1,579,678	8,521,222
Taxable Individual Retirement Arrangements distributions: Number	400,181	219,678	72,934	47,904	47,785	11,880
Amount	4,880,522	1,395,073	876,685	790,691	1,218,955	599,118
Pensions and annuities in AGI: Number	1,009,732	606,550	165,837	107,715	108,148	21,482
Amount	17,692,199	7,258,166	3,503,511	2,689,288	3,307,880	933,354
Unemployment compensation: Number	465,133	289,097	91,121	49,293	33,621	2,001
Amount	1,734,371	1,104,172	340,337	169,314	112,119	8,430
Social Security benefits in AGI: Number	509,618	249,643	115,159	67,069	60,567	17,180
Amount	5,958,059	1,769,149	1,557,811	1,147,020	1,124,031	360,048
Self-employment retirement plans: Number	27,664	4,050	3,143	3,388	8,754	8,329
Amount	417,046	20,676	22,391	29,884	119,668	224,427
Total itemized deductions [6]: Number	1,710,352	551,855	395,849	309,139	361,442	92,067
Amount	35,402,745	7,938,038	6,559,430	5,944,340	9,015,128	5,945,810
State and local income taxes: Number	1,482,212	400,122	357,295	288,613	346,537	89,645
Amount	5,971,157	577,364	855,924	945,159	1,727,037	1,865,674
State and local general sales taxes: Number	200,093	126,899	36,486	19,807	14,508	2,393
Amount	217,966	88,927	47,432	34,045	36,003	11,557
Real estate taxes: Number	1,585,283	478,428	369,202	296,482	351,241	89,930
Amount	5,526,635	1,204,314	1,017,347	950,334	1,512,273	842,366
Taxes paid: Number	1,711,701	551,449	396,670	309,659	361,797	92,126
Amount	12,222,716	1,982,429	2,019,412	2,021,494	3,403,235	2,796,147
Mortgage Interest paid: Number	1,497,437	446,295	357,233	286,025	330,473	77,411
Amount	14,050,687	3,112,108	2,923,414	2,606,283	3,673,415	1,735,465
Contributions: Number	1,462,192	407,577	341,183	281,388	342,958	89,086
Amount	5,228,555	763,569	797,182	773,491	1,305,569	1,588,744
Taxable income: Number	3,503,273	1,942,210	653,431	407,066	405,445	95,121
Amount	157,590,630	26,439,217	26,271,974	24,552,721	39,604,219	40,722,498
Total tax credits [7]: Number	1,493,845	692,360	318,461	230,304	205,336	47,384
Amount	1,749,917	499,875	478,576	377,852	228,531	165,083
Child tax credit: Number	841,474	351,474	220,316	155,130	114,498	56
Amount	1,113,371	305,368	366,489	275,704	165,755	56
Child and dependent care credit: Number	180,024	57,368	40,530	34,711	41,611	5,804
Amount	86,509	28,195	18,862	16,718	19,901	2,833
Earned income credit [8]: Number	702,251	702,251	0	0	0	0
Amount	1,333,045	1,333,044	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	621,735	621,735	0	0	0	0
Amount	1,170,281	1,170,281	0	0	0	0
Alternative minimum tax: Number	89,131	869	1,966	2,848	22,984	60,464
Amount	352,370	2,496	2,328	4,222	40,359	302,965
Income tax [10]: Number	3,160,490	1,631,584	625,212	403,636	404,928	95,130
Amount	26,793,190	2,755,098	3,281,501	3,308,190	6,930,416	10,517,985
Total tax liability [11]: Number	3,404,371	1,865,385	633,707	404,881	405,251	95,147
Amount	28,084,686	3,220,480	3,471,598	3,463,512	7,197,280	10,731,814
Tax due at time of filing [12]: Number	756,797	351,799	137,580	86,730	133,967	46,721
Amount	2,595,895	314,143	259,530	215,265	561,242	1,245,715
Overpayments [13]: Number	3,755,022	2,654,987	504,372	309,999	253,647	32,017
Amount	8,261,298	4,177,757	1,476,434	1,104,282	1,065,577	437,248

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
MINNESOTA						
Number of returns	2,559,718	1,622,555	383,021	242,198	239,705	72,239
Number of joint returns	1,043,655	315,513	246,393	204,234	213,575	63,940
Number with paid preparer's signature	1,426,823	843,475	236,379	146,527	144,089	56,353
Number of exemptions	4,870,974	2,324,367	929,482	682,694	713,695	220,736
Adjusted gross income (AGI) [3]	145,576,400	31,653,585	23,641,692	20,914,371	31,505,941	37,860,810
Salaries and wages in AGI [4]: Number	2,149,009	1,297,981	343,917	221,834	220,980	64,297
Amount	104,315,488	26,549,524	18,689,694	16,660,523	24,308,155	18,107,591
Taxable interest: Number	1,258,666	578,061	237,899	175,551	198,765	68,390
Amount	3,374,152	814,832	379,633	306,522	530,858	1,342,305
Ordinary dividends: Number	700,177	278,457	123,114	101,316	138,704	58,586
Amount	3,138,810	420,337	252,917	237,897	536,072	1,691,587
Business or profession net income (less loss):						
Number	390,620	205,585	71,523	46,880	48,983	17,649
Amount	4,140,161	1,114,994	620,460	499,331	944,857	960,517
Number of farm returns	73,450	42,030	14,214	8,218	6,543	2,445
Net capital gain (less loss) in AGI: Number	592,610	236,037	98,776	81,579	119,041	57,177
Amount	9,788,364	535,355	372,549	423,252	1,267,310	7,189,899
Taxable Individual Retirement Arrangements distributions: Number	216,136	114,912	40,585	27,248	26,158	7,233
Amount	2,497,663	723,256	452,779	414,363	593,184	314,083
Pensions and annuities in AGI: Number	429,917	231,094	82,136	53,358	50,316	13,013
Amount	7,613,188	2,509,794	1,702,421	1,353,419	1,575,840	471,715
Unemployment compensation: Number	140,855	85,780	30,194	15,365	8,746	770
Amount	581,736	325,006	137,901	72,254	42,178	4,398
Social Security benefits in AGI: Number	257,983	117,407	63,503	36,108	31,104	9,861
Amount	2,661,807	538,943	806,715	578,365	541,678	196,105
Self-employment retirement plans: Number	24,529	3,967	3,347	3,506	7,462	6,247
Amount	328,693	20,209	22,426	28,003	98,207	159,847
Total itemized deductions [6]: Number	1,060,358	318,454	246,064	198,747	226,233	70,860
Amount	24,542,488	4,704,233	4,208,249	3,964,724	6,056,819	5,608,463
State and local income taxes: Number	973,531	249,715	236,355	194,919	223,143	69,399
Amount	6,154,227	467,885	701,349	829,608	1,625,310	2,530,075
State and local general sales taxes: Number	76,252	58,857	9,294	3,724	2,974	1,403
Amount	151,458	47,593	16,371	9,636	12,099	65,760
Real estate taxes: Number	983,951	275,310	229,856	190,495	219,452	68,838
Amount	2,683,346	500,791	480,914	476,577	748,281	476,784
Taxes paid: Number	1,060,025	317,559	246,359	198,918	226,313	70,876
Amount	9,206,295	1,055,095	1,239,330	1,357,225	2,444,004	3,110,642
Mortgage Interest paid: Number	915,629	252,902	218,643	180,668	203,010	60,406
Amount	9,740,909	2,106,247	1,996,360	1,789,025	2,441,957	1,407,323
Contributions: Number	913,460	234,663	211,611	182,446	215,976	68,764
Amount	3,335,644	375,731	415,399	439,229	777,725	1,327,559
Taxable income: Number	2,032,688	1,098,250	381,133	241,771	239,398	72,136
Amount	100,194,970	15,793,690	15,119,497	14,278,072	22,979,086	32,024,626
Total tax credits [7]: Number	847,410	365,654	181,286	138,706	124,986	36,778
Amount	1,028,645	269,193	286,347	241,486	143,936	87,682
Child tax credit: Number	457,693	167,836	125,344	94,832	69,630	51
Amount	628,872	148,866	209,457	169,806	100,690	54
Child and dependent care credit: Number	145,206	41,889	35,094	30,212	31,481	6,530
Amount	64,785	18,823	16,107	13,839	13,260	2,754
Earned income credit [8]: Number	281,927	281,927	0	0	0	0
Amount	474,213	474,213	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	240,533	240,533	0	0	0	0
Amount	414,287	414,287	0	0	0	0
Alternative minimum tax: Number	74,282	445	762	1,311	17,331	54,433
Amount	379,454	1,603	1,093	2,331	32,090	342,337
Income tax [10]: Number	1,854,934	942,176	362,346	239,307	238,942	72,163
Amount	17,874,175	1,702,066	1,861,530	1,856,448	3,960,715	8,493,417
Total tax liability [11]: Number	1,967,193	1,046,397	369,100	240,277	239,227	72,192
Amount	18,765,670	1,990,269	2,009,685	1,975,503	4,142,876	8,647,337
Tax due at time of filing [12]: Number	537,950	249,132	96,263	62,082	90,902	39,571
Amount	2,187,491	238,848	189,325	168,264	410,443	1,180,609
Overpayments [13]: Number	1,942,206	1,329,879	277,684	173,512	138,438	22,693
Amount	3,850,902	1,800,919	693,936	520,472	541,197	294,378

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
MISSISSIPPI						
Number of returns	1,234,286	940,634	137,984	73,535	63,751	18,382
Number of joint returns	428,382	196,020	96,506	63,075	56,794	15,987
Number with paid preparer's signature	803,408	603,592	91,213	48,250	44,071	16,282
Number of exemptions	2,574,385	1,784,616	352,303	204,558	180,875	52,033
Adjusted gross income (AGI) [3]	49,860,479	16,946,325	8,458,714	6,328,927	8,283,824	9,842,690
Salaries and wages in AGI [4]: Number	1,050,783	788,725	123,897	66,489	56,715	14,957
Amount	36,162,585	15,386,126	6,743,226	4,932,151	5,825,334	3,275,745
Taxable interest: Number	369,210	185,141	69,477	47,672	49,791	17,129
Amount	1,053,786	306,293	129,389	100,995	169,265	347,843
Ordinary dividends: Number	159,463	67,666	28,315	21,758	28,382	13,342
Amount	762,918	116,626	68,233	64,279	142,254	371,528
Business or profession net income (less loss):						
Number	194,408	131,500	25,393	14,982	15,749	6,784
Amount	2,037,952	624,665	229,259	185,129	401,115	597,784
Number of farm returns	39,458	19,549	7,315	4,920	5,196	2,478
Net capital gain (less loss) in AGI: Number	136,937	56,985	23,279	17,931	25,258	13,484
Amount	2,950,686	230,270	103,349	111,954	346,639	2,158,472
Taxable Individual Retirement Arrangements distributions: Number	62,501	33,737	11,571	7,457	7,590	2,146
Amount	689,720	218,842	122,947	106,531	158,231	83,168
Pensions and annuities in AGI: Number	194,446	114,130	34,979	21,495	19,531	4,311
Amount	3,384,851	1,350,208	708,940	528,338	630,733	166,633
Unemployment compensation: Number	60,252	49,112	6,646	2,681	1,595	218
Amount	162,525	131,189	18,213	7,572	4,796	755
Social Security benefits in AGI: Number	116,729	63,340	24,644	13,236	11,668	3,841
Amount	1,069,120	274,901	303,995	209,498	205,259	75,466
Self-employment retirement plans: Number	5,823	778	544	598	1,702	2,201
Amount	105,285	4,238	4,393	5,632	24,818	66,205
Total itemized deductions [6]: Number	307,178	120,496	67,541	48,863	53,062	17,216
Amount	7,032,422	2,039,703	1,255,652	991,806	1,381,951	1,363,310
State and local income taxes: Number	233,805	75,929	53,296	41,550	47,126	15,904
Amount	1,035,430	162,826	122,647	136,532	247,110	366,316
State and local general sales taxes: Number	66,154	38,280	13,642	7,084	5,847	1,301
Amount	108,203	40,714	23,958	16,091	17,139	10,300
Real estate taxes: Number	243,624	79,845	55,767	43,625	48,729	15,658
Amount	345,947	82,959	58,840	54,838	85,224	64,086
Taxes paid: Number	307,180	119,912	67,810	49,030	53,197	17,231
Amount	1,624,005	326,221	234,591	230,404	378,781	454,008
Mortgage Interest paid: Number	238,185	81,461	55,420	42,381	45,505	13,418
Amount	1,901,432	499,509	391,488	314,388	409,091	286,956
Contributions: Number	259,150	92,150	57,912	43,831	49,009	16,248
Amount	1,405,083	284,635	235,523	204,801	313,647	366,476
Taxable income: Number	855,847	564,345	136,805	73,099	63,370	18,228
Amount	31,470,115	6,958,081	5,438,500	4,439,309	6,233,303	8,400,921
Total tax credits [7]: Number	390,588	251,331	65,337	38,348	27,750	7,822
Amount	449,768	191,841	108,260	67,804	38,085	43,778
Child tax credit: Number	265,743	169,456	51,587	28,406	16,286	8
Amount	282,983	131,573	81,737	47,032	22,507	132
Child and dependent care credit: Number	61,002	32,126	13,236	8,413	6,388	839
Amount	33,063	17,714	6,907	4,525	3,477	441
Earned income credit [8]: Number	388,628	388,628	0	0	0	0
Amount	888,431	888,432	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	358,563	358,563	0	0	0	0
Amount	814,315	814,315	0	0	0	0
Alternative minimum tax: Number	13,931	644	839	821	2,987	8,640
Amount	54,409	1,673	1,176	1,648	6,930	42,984
Income tax [10]: Number	700,045	414,647	131,459	72,490	63,223	18,226
Amount	5,083,420	649,269	651,901	590,366	1,087,087	2,104,797
Total tax liability [11]: Number	785,263	497,423	133,332	72,810	63,407	18,291
Amount	5,495,005	814,213	707,690	632,609	1,158,922	2,181,569
Tax due at time of filing [12]: Number	198,686	102,070	36,119	22,011	28,206	10,280
Amount	852,562	108,199	80,461	68,531	170,037	425,334
Overpayments [13]: Number	1,005,405	820,818	98,809	49,285	31,906	4,587
Amount	2,513,444	1,855,864	268,902	170,406	135,016	83,256

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
MISSOURI						
Number of returns	2,720,684	1,892,948	371,903	209,787	192,193	53,853
Number of joint returns	1,102,907	454,246	254,773	176,582	170,271	47,035
Number with paid preparer's signature	1,608,728	1,084,559	233,439	128,315	119,233	43,182
Number of exemptions	5,263,958	3,047,093	920,661	580,992	555,867	159,345
Adjusted gross income (AGI) [3]	131,089,335	36,032,792	22,868,251	18,068,242	25,113,972	29,006,078
Salaries and wages in AGI [4]: Number	2,254,005	1,513,049	331,564	189,866	173,542	45,984
Amount	93,075,996	30,044,859	17,985,076	14,146,546	18,536,409	12,363,106
Taxable interest: Number	1,183,039	601,826	220,202	150,704	159,302	51,005
Amount	3,393,411	1,049,505	433,441	327,930	521,211	1,061,325
Ordinary dividends: Number	632,545	279,292	114,179	86,454	109,115	43,505
Amount	3,274,535	499,261	291,179	261,943	561,549	1,660,603
Business or profession net income (less loss):						
Number	405,464	243,796	65,852	39,666	40,802	15,348
Amount	3,933,313	1,006,578	555,031	428,201	871,137	1,072,366
Number of farm returns	103,981	62,630	19,065	10,338	8,747	3,201
Net capital gain (less loss) in AGI: Number	527,994	232,080	91,271	69,082	93,189	42,372
Amount	8,060,262	581,929	367,862	387,515	1,071,103	5,651,853
Taxable Individual Retirement Arrangements distributions: Number	219,023	120,137	41,125	25,874	25,058	6,829
Amount	2,516,977	738,653	466,532	409,050	617,457	285,285
Pensions and annuities in AGI: Number	514,424	303,705	92,624	55,208	51,201	11,686
Amount	8,488,709	3,319,971	1,824,391	1,331,430	1,556,664	456,253
Unemployment compensation: Number	143,378	101,771	23,682	10,833	6,597	495
Amount	361,365	256,862	58,019	27,054	17,735	1,694
Social Security benefits in AGI: Number	283,727	139,307	67,166	36,080	31,149	10,025
Amount	2,743,574	615,680	832,353	562,091	533,353	200,099
Self-employment retirement plans: Number	18,118	2,512	2,078	2,199	5,534	5,795
Amount	279,928	13,243	14,645	19,292	77,124	155,624
Total itemized deductions [6]: Number	864,135	283,135	201,325	155,463	172,187	52,025
Amount	18,089,082	4,083,343	3,234,182	2,873,757	4,184,012	3,713,788
State and local income taxes: Number	771,209	210,991	189,955	150,895	168,528	50,840
Amount	3,901,570	343,778	490,615	558,494	1,027,823	1,480,861
State and local general sales taxes: Number	82,714	62,191	11,155	4,579	3,615	1,174
Amount	106,684	52,781	24,730	11,381	10,864	6,927
Real estate taxes: Number	783,937	235,298	184,854	147,827	165,885	50,073
Amount	1,782,761	371,242	327,689	310,701	477,108	296,022
Taxes paid: Number	864,574	282,482	201,855	155,794	172,376	52,067
Amount	6,144,954	821,325	917,601	954,357	1,616,863	1,834,809
Mortgage Interest paid: Number	729,448	217,844	176,517	140,386	152,537	42,164
Amount	6,513,773	1,509,543	1,335,000	1,169,781	1,536,626	962,821
Contributions: Number	708,661	199,335	164,677	135,748	159,068	49,833
Amount	2,893,446	407,444	415,827	394,966	648,558	1,026,651
Taxable income: Number	2,057,605	1,231,676	370,625	209,522	191,989	53,793
Amount	88,553,850	16,859,593	14,991,641	12,734,257	18,904,666	25,063,693
Total tax credits [7]: Number	850,221	440,668	176,190	114,031	93,045	26,287
Amount	944,661	325,001	275,820	189,749	102,903	51,190
Child tax credit: Number	502,727	242,043	129,132	79,843	51,676	33
Amount	637,247	210,825	213,053	139,217	74,123	31
Child and dependent care credit: Number	126,201	46,006	32,629	23,083	20,991	3,492
Amount	60,406	21,499	15,520	11,571	10,141	1,676
Earned income credit [8]: Number	462,720	462,720	0	0	0	0
Amount	871,804	871,804	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	408,350	408,350	0	0	0	0
Amount	781,657	781,657	0	0	0	0
Alternative minimum tax: Number	48,385	499	994	1,281	10,538	35,073
Amount	230,536	1,680	1,346	2,110	21,084	204,314
Income tax [10]: Number	1,837,523	1,027,139	356,849	207,984	191,752	53,799
Amount	15,084,043	1,739,301	1,832,563	1,694,214	3,292,673	6,525,291
Total tax liability [11]: Number	1,974,303	1,158,542	361,474	208,551	191,919	53,817
Amount	15,965,741	2,048,903	1,967,625	1,796,285	3,463,024	6,689,904
Tax due at time of filing [12]: Number	500,523	249,995	90,911	54,380	75,672	29,565
Amount	1,929,757	234,776	184,999	152,498	376,325	981,160
Overpayments [13]: Number	2,142,935	1,597,661	272,682	149,547	107,487	15,558
Amount	4,474,454	2,602,744	721,266	480,498	432,899	237,047

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
MONTANA						
Number of returns	465,929	337,532	61,869	32,118	25,601	8,809
Number of joint returns	194,338	90,047	46,389	27,953	22,434	7,515
Number with paid preparer's signature	287,007	196,074	41,679	22,031	19,203	8,020
Number of exemptions	868,475	526,920	157,804	88,993	70,693	24,065
Adjusted gross income (AGI) [3]	20,404,746	6,089,688	3,798,359	2,760,866	3,345,268	4,410,566
Salaries and wages in AGI [4]: Number	376,673	266,370	53,855	28,082	21,575	6,791
Amount	12,818,610	4,962,414	2,796,488	1,965,478	1,952,373	1,141,855
Taxable interest: Number	230,397	132,950	41,692	24,929	22,285	8,541
Amount	654,225	202,906	88,502	63,174	105,317	194,327
Ordinary dividends: Number	119,691	63,150	20,830	14,254	14,679	6,778
Amount	529,840	126,123	56,903	48,635	92,822	205,357
Business or profession net income (less loss):						
Number	83,807	52,607	14,125	7,419	6,720	2,936
Amount	846,846	263,822	129,415	91,695	162,519	199,397
Number of farm returns	20,624	13,169	3,265	1,661	1,629	900
Net capital gain (less loss) in AGI: Number	110,114	56,883	18,850	12,889	14,326	7,166
Amount	2,170,596	175,658	112,370	115,362	322,963	1,444,241
Taxable Individual Retirement Arrangements distributions: Number	35,462	20,744	6,438	3,852	3,357	1,071
Amount	362,901	120,277	65,351	56,048	79,553	41,674
Pensions and annuities in AGI: Number	85,079	52,223	15,476	8,512	6,921	1,947
Amount	1,411,672	597,416	316,994	213,885	211,279	72,099
Unemployment compensation: Number	26,014	19,373	4,315	1,581	681	64
Amount	70,806	50,139	12,910	5,016	2,526	214
Social Security benefits in AGI: Number	48,847	24,192	11,427	6,016	5,153	2,059
Amount	454,368	106,652	137,817	90,758	83,384	35,757
Self-employment retirement plans: Number	3,963	794	602	565	1,121	881
Amount	57,989	4,218	4,392	5,563	17,086	26,729
Total itemized deductions [6]: Number	146,552	58,785	34,304	23,205	22,069	8,189
Amount	2,902,231	834,240	563,236	434,720	540,656	529,379
State and local income taxes: Number	133,760	47,849	33,491	22,766	21,650	8,004
Amount	624,557	70,490	90,705	91,920	146,333	225,110
State and local general sales taxes: Number	1,384	642	252	164	215	111
Amount	4,532	541	431	368	721	2,472
Real estate taxes: Number	131,022	48,886	31,503	21,980	20,979	7,674
Amount	279,744	81,164	57,591	46,555	56,909	37,526
Taxes paid: Number	145,469	57,597	34,362	23,221	22,097	8,192
Amount	953,768	164,174	159,079	147,342	213,365	269,809
Mortgage Interest paid: Number	115,913	41,762	29,024	20,248	18,574	6,305
Amount	1,023,680	297,210	227,985	171,885	192,790	133,810
Contributions: Number	117,396	40,972	28,187	20,251	20,216	7,770
Amount	415,907	70,115	62,128	52,828	83,869	146,966
Taxable income: Number	346,515	218,490	61,612	32,064	25,553	8,796
Amount	13,603,118	2,841,855	2,450,305	1,942,825	2,538,914	3,829,220
Total tax credits [7]: Number	139,394	74,369	30,986	17,853	12,343	3,843
Amount	147,068	50,565	46,645	28,157	13,213	8,488
Child tax credit: Number	74,606	36,239	21,081	11,320	5,957	9
Amount	96,277	31,947	35,376	20,158	8,791	7
Child and dependent care credit: Number	17,568	6,950	5,376	2,961	1,886	395
Amount	7,282	2,778	2,264	1,235	802	201
Earned income credit [8]: Number	74,544	74,544	0	0	0	0
Amount	128,869	128,870	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	63,382	63,382	0	0	0	0
Amount	112,424	112,424	0	0	0	0
Alternative minimum tax: Number	8,442	567	221	274	1,588	5,792
Amount	40,872	601	239	448	3,668	35,917
Income tax [10]: Number	311,300	186,315	58,885	31,791	25,512	8,797
Amount	2,162,864	290,895	288,119	251,997	430,892	900,963
Total tax liability [11]: Number	339,339	213,205	59,882	31,915	25,536	8,801
Amount	2,342,349	362,746	318,051	272,799	462,670	926,085
Tax due at time of filing [12]: Number	104,412	55,742	19,606	11,088	12,764	5,212
Amount	432,795	56,648	43,070	34,952	83,622	214,501
Overpayments [13]: Number	339,926	268,224	39,973	19,414	10,547	1,768
Amount	604,624	376,710	96,195	57,066	45,576	29,078

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
NEBRASKA						
Number of returns	833,432	570,637	121,298	68,553	57,366	15,578
Number of joint returns	357,847	140,540	90,812	60,487	52,163	13,845
Number with paid preparer's signature	499,041	328,531	77,694	42,742	36,916	13,158
Number of exemptions	1,642,839	899,729	322,891	200,817	172,829	46,573
Adjusted gross income (AGI) [3]	41,039,481	11,110,224	7,465,519	5,900,657	7,450,959	9,112,121
Salaries and wages in AGI [4]: Number	712,918	474,557	109,746	62,947	52,209	13,459
Amount	29,065,007	9,580,282	5,923,988	4,647,213	5,393,702	3,519,821
Taxable interest: Number	411,408	217,151	77,260	52,090	49,781	15,126
Amount	1,181,163	336,797	146,864	108,698	166,451	422,350
Ordinary dividends: Number	216,499	100,144	40,021	30,036	33,632	12,666
Amount	895,326	141,481	82,840	74,086	150,229	446,689
Business or profession net income (less loss):						
Number	127,054	73,223	23,432	13,517	12,486	4,396
Amount	1,056,350	332,379	164,635	122,468	216,300	220,567
Number of farm returns	47,530	30,456	8,262	4,307	3,279	1,226
Net capital gain (less loss) in AGI: Number	198,422	93,306	35,346	26,155	31,027	12,588
Amount	2,952,567	240,418	148,903	149,265	359,260	2,054,722
Taxable Individual Retirement Arrangements distributions: Number	73,593	42,325	13,845	8,010	7,376	2,037
Amount	730,790	239,860	138,678	112,258	152,820	87,175
Pensions and annuities in AGI: Number	135,476	76,386	25,840	15,801	14,269	3,180
Amount	1,991,470	722,709	433,148	328,773	394,698	112,142
Unemployment compensation: Number	31,785	24,467	4,508	1,805	917	88
Amount	81,219	61,590	11,621	4,956	2,725	326
Social Security benefits in AGI: Number	86,264	42,426	20,768	10,930	9,102	3,038
Amount	864,140	193,938	265,509	178,886	163,506	62,301
Self-employment retirement plans: Number	5,954	1,059	872	884	1,735	1,404
Amount	76,020	5,084	5,503	7,254	21,943	36,237
Total itemized deductions [6]: Number	262,297	83,101	61,487	50,812	51,944	14,953
Amount	5,593,364	1,188,014	989,348	934,396	1,290,914	1,190,693
State and local income taxes: Number	228,824	58,211	56,870	48,873	50,527	14,343
Amount	1,270,406	106,235	155,267	191,785	344,846	472,273
State and local general sales taxes: Number	30,796	22,371	4,531	1,903	1,377	614
Amount	49,986	18,604	7,922	4,429	4,689	14,342
Real estate taxes: Number	235,259	66,920	56,583	48,236	49,490	14,030
Amount	764,384	159,196	150,469	148,683	199,831	106,205
Taxes paid: Number	262,182	82,704	61,649	50,890	51,970	14,969
Amount	2,195,768	305,227	336,474	368,755	579,691	605,622
Mortgage Interest paid: Number	211,364	57,277	52,336	45,166	44,921	11,664
Amount	1,665,042	348,262	357,348	336,544	401,523	221,367
Contributions: Number	225,837	61,726	53,200	46,675	49,683	14,553
Amount	988,815	112,025	120,893	124,536	208,788	422,573
Taxable income: Number	656,302	394,063	120,887	68,471	57,312	15,569
Amount	27,834,908	5,418,600	4,836,577	4,123,048	5,535,665	7,921,017
Total tax credits [7]: Number	290,363	147,137	64,465	40,833	30,285	7,643
Amount	335,805	106,089	106,039	71,297	35,461	16,919
Child tax credit: Number	162,778	71,601	46,092	28,096	16,968	21
Amount	223,172	64,729	80,350	51,933	26,142	17
Child and dependent care credit: Number	53,054	19,817	14,907	9,837	7,425	1,068
Amount	24,897	9,164	7,319	4,759	3,192	463
Earned income credit [8]: Number	115,764	115,764	0	0	0	0
Amount	207,810	207,809	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	100,649	100,649	0	0	0	0
Amount	185,564	185,563	0	0	0	0
Alternative minimum tax: Number	16,896	184	285	405	4,592	11,430
Amount	78,505	259	413	678	8,023	69,132
Income tax [10]: Number	585,474	329,650	115,067	67,963	57,222	15,572
Amount	4,654,025	554,522	559,455	525,327	943,444	2,071,279
Total tax liability [11]: Number	627,620	369,592	117,039	68,140	57,277	15,572
Amount	4,924,749	656,757	608,522	560,970	992,661	2,105,840
Tax due at time of filing [12]: Number	168,096	85,229	31,893	18,685	23,347	8,942
Amount	694,581	86,057	71,986	60,923	129,998	345,617
Overpayments [13]: Number	638,963	470,004	86,198	47,701	30,907	4,153
Amount	1,257,228	715,677	214,041	145,254	118,904	63,352

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
NEVADA						
Number of returns	1,210,794	806,717	175,744	96,522	97,844	33,967
Number of joint returns	434,657	159,771	97,905	71,566	79,491	25,924
Number with paid preparer's signature	718,023	465,021	105,115	57,456	62,250	28,181
Number of exemptions	2,440,019	1,426,935	416,528	249,192	260,839	86,525
Adjusted gross income (AGI) [3]	77,211,961	16,687,655	10,773,455	8,318,674	12,891,912	28,540,264
Salaries and wages in AGI [4]: Number	1,048,599	692,747	157,162	86,291	86,072	26,327
Amount	47,478,671	15,684,735	8,679,477	6,475,489	9,177,470	7,461,500
Taxable interest: Number	442,705	193,277	84,566	59,259	74,155	31,448
Amount	2,864,603	450,621	180,768	155,115	320,680	1,757,418
Ordinary dividends: Number	199,842	76,127	34,295	26,739	39,594	23,087
Amount	1,810,555	182,872	95,821	89,188	220,802	1,221,871
Business or profession net income (less loss):						
Number	161,634	90,855	24,497	16,424	20,268	9,590
Amount	2,059,064	353,287	232,962	201,799	443,366	827,649
Number of farm returns	3,777	1,519	637	457	619	545
Net capital gain (less loss) in AGI: Number	184,430	68,255	30,074	23,699	37,502	24,900
Amount	11,877,674	391,814	123,509	154,219	613,810	10,594,321
Taxable Individual Retirement Arrangements distributions: Number	70,126	31,916	13,640	9,556	10,993	4,021
Amount	1,070,636	239,143	165,484	159,473	292,717	213,819
Pensions and annuities in AGI: Number	200,878	98,222	39,856	26,362	28,377	8,061
Amount	4,183,930	1,207,154	878,227	715,778	1,010,594	372,178
Unemployment compensation: Number	58,130	38,498	10,897	5,089	3,247	399
Amount	199,135	133,288	35,813	16,655	11,485	1,893
Social Security benefits in AGI: Number	119,888	49,903	28,616	17,036	16,862	7,471
Amount	1,215,423	231,456	340,373	247,303	263,663	132,629
Self-employment retirement plans: Number	6,522	1,051	699	737	1,895	2,140
Amount	119,591	7,209	6,421	7,888	30,551	67,522
Total itemized deductions [6]: Number	457,724	170,658	104,117	70,846	82,169	29,934
Amount	13,518,072	3,135,956	2,190,118	1,728,782	2,639,315	3,823,902
State and local income taxes: Number	53,635	18,229	11,099	7,600	10,120	6,587
Amount	449,325	33,652	21,558	20,859	46,700	326,557
State and local general sales taxes: Number	330,505	112,277	75,994	54,447	65,325	22,462
Amount	553,981	114,720	107,876	96,130	149,551	85,703
Real estate taxes: Number	395,113	131,982	91,305	65,269	77,925	28,632
Amount	1,053,808	259,532	174,758	146,177	233,536	239,808
Taxes paid: Number	450,542	165,072	103,082	70,428	81,986	29,974
Amount	2,277,435	465,443	348,688	299,206	480,589	683,509
Mortgage Interest paid: Number	396,905	135,637	92,513	65,411	76,509	26,835
Amount	6,561,784	1,749,283	1,237,874	970,360	1,348,417	1,255,848
Contributions: Number	367,676	119,809	85,535	61,101	73,929	27,302
Amount	1,478,537	176,114	170,051	151,343	261,073	719,957
Taxable income: Number	974,019	573,223	173,538	96,019	97,494	33,745
Amount	54,366,209	8,072,259	6,629,914	5,533,748	9,292,558	24,837,730
Total tax credits [7]: Number	379,830	210,374	73,495	44,971	38,711	12,279
Amount	459,667	163,936	115,070	73,991	46,717	59,952
Child tax credit: Number	245,931	131,323	58,321	33,669	22,608	10
Amount	296,129	111,230	94,808	57,941	32,141	9
Child and dependent care credit: Number	54,638	22,961	12,073	8,785	9,332	1,487
Amount	31,308	13,269	6,726	4,987	5,434	893
Earned income credit [8]: Number	174,873	174,873	0	0	0	0
Amount	311,653	311,653	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	154,290	154,290	0	0	0	0
Amount	281,687	281,687	0	0	0	0
Alternative minimum tax: Number	18,198	356	847	965	4,387	11,643
Amount	106,991	2,117	1,043	1,427	9,926	92,478
Income tax [10]: Number	850,122	462,249	162,397	94,473	97,249	33,754
Amount	10,427,538	846,943	852,383	772,454	1,639,956	6,315,801
Total tax liability [11]: Number	900,346	508,556	165,434	95,073	97,459	33,824
Amount	10,821,554	964,948	904,554	816,178	1,720,641	6,415,235
Tax due at time of filing [12]: Number	215,847	99,074	39,628	24,209	35,324	17,612
Amount	1,385,866	106,923	85,342	71,837	197,197	924,567
Overpayments [13]: Number	956,765	686,742	132,709	69,538	57,865	9,911
Amount	2,502,177	1,275,876	404,255	262,459	283,017	276,572

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
NEW HAMPSHIRE						
Number of returns	660,961	405,297	99,023	65,403	71,529	19,709
Number of joint returns	272,812	75,831	62,964	54,011	62,902	17,104
Number with paid preparer's signature	324,727	183,809	53,026	34,173	38,870	14,849
Number of exemptions	1,223,665	546,926	231,195	178,517	209,636	57,391
Adjusted gross income (AGI) [3]	40,176,027	8,232,258	6,109,570	5,655,116	9,456,609	10,722,474
Salaries and wages in AGI [4]: Number	564,594	333,829	88,878	59,842	65,306	16,739
Amount	28,635,146	6,807,687	4,838,873	4,524,113	7,327,574	5,136,899
Taxable interest: Number	331,424	143,697	60,780	47,653	60,421	18,873
Amount	956,512	201,554	101,704	87,626	164,912	400,717
Ordinary dividends: Number	181,616	70,429	30,643	26,297	38,595	15,652
Amount	1,029,768	130,924	84,651	84,135	201,075	528,985
Business or profession net income (less loss):						
Number	108,827	55,716	18,756	13,316	15,466	5,573
Amount	1,928,785	434,022	265,107	228,425	432,712	568,520
Number of farm returns	2,062	992	356	222	324	168
Net capital gain (less loss) in AGI: Number	148,034	53,883	23,390	20,811	34,371	15,579
Amount	3,634,022	111,279	91,877	111,989	406,241	2,912,636
Taxable Individual Retirement Arrangements distributions: Number	54,445	26,778	10,249	7,256	7,769	2,393
Amount	713,716	173,064	115,925	115,383	195,646	113,698
Pensions and annuities in AGI: Number	113,136	57,340	21,174	14,702	15,779	4,141
Amount	2,023,415	634,775	409,275	337,946	467,151	174,269
Unemployment compensation: Number	30,610	18,356	6,016	3,474	2,486	278
Amount	109,305	57,118	23,799	14,478	12,297	1,612
Social Security benefits in AGI: Number	70,061	30,332	16,875	9,910	9,419	3,525
Amount	741,123	139,434	210,919	157,500	163,876	69,394
Self-employment retirement plans: Number	8,408	1,433	1,205	1,222	2,626	1,922
Amount	122,539	8,796	10,073	12,457	39,160	52,053
Total itemized deductions [6]: Number	247,335	69,555	53,430	45,991	60,793	17,566
Amount	5,395,121	1,093,133	940,030	916,776	1,486,626	958,556
State and local income taxes: Number	103,422	18,499	19,813	20,388	32,547	12,175
Amount	430,046	24,398	41,044	56,890	132,465	175,248
State and local general sales taxes: Number	2,920	951	572	459	710	228
Amount	2,716	869	380	323	706	438
Real estate taxes: Number	234,137	62,088	50,792	44,592	59,418	17,247
Amount	1,313,596	262,117	233,674	233,510	387,910	196,386
Taxes paid: Number	245,078	67,459	53,149	46,044	60,812	17,614
Amount	1,853,660	308,071	294,546	311,199	553,435	386,410
Mortgage Interest paid: Number	216,618	55,486	48,042	42,590	55,699	14,801
Amount	2,355,325	477,286	460,233	448,229	669,225	300,353
Contributions: Number	201,340	46,854	42,882	39,458	55,451	16,695
Amount	621,260	54,233	62,070	67,370	144,315	293,271
Taxable income: Number	540,892	285,984	98,480	65,284	71,447	19,697
Amount	29,006,606	4,243,633	4,002,260	3,960,667	7,178,159	9,621,887
Total tax credits [7]: Number	219,637	86,741	46,710	37,750	38,023	10,413
Amount	255,181	63,646	67,701	61,228	40,048	22,558
Child tax credit: Number	117,458	40,476	31,708	25,162	20,103	9
Amount	157,900	36,974	50,258	42,842	27,816	10
Child and dependent care credit: Number	30,917	8,290	6,829	6,749	7,747	1,302
Amount	15,732	4,126	3,341	3,587	4,009	668
Earned income credit [8]: Number	65,306	65,306	0	0	0	0
Amount	105,168	105,167	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	53,377	53,377	0	0	0	0
Amount	88,814	88,815	0	0	0	0
Alternative minimum tax: Number	14,917	129	255	406	4,259	9,868
Amount	64,599	400	293	614	7,509	55,782
Income tax [10]: Number	502,881	252,421	94,642	64,747	71,381	19,690
Amount	5,176,919	470,127	505,951	530,753	1,262,923	2,407,166
Total tax liability [11]: Number	530,575	278,348	96,142	64,962	71,427	19,696
Amount	5,492,858	562,912	557,515	574,935	1,335,972	2,461,526
Tax due at time of filing [12]: Number	126,274	54,204	21,405	14,805	25,159	10,701
Amount	614,920	61,281	46,195	43,533	117,755	346,155
Overpayments [13]: Number	509,549	337,761	74,728	48,344	42,798	5,918
Amount	1,141,387	496,899	212,917	171,628	182,224	77,721

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
NEW JERSEY						
Number of returns	4,229,622	2,503,944	575,080	391,908	552,278	206,412
Number of joint returns	1,581,386	408,983	260,446	268,441	461,690	181,826
Number with paid preparer's signature	2,762,399	1,587,230	382,043	262,723	371,485	158,918
Number of exemptions	8,170,700	3,687,039	1,222,345	1,000,535	1,611,746	649,035
Adjusted gross income (AGI) [3]	302,073,205	49,407,306	35,426,646	33,999,940	74,609,638	108,629,675
Salaries and wages in AGI [4]: Number	3,534,979	1,978,405	505,973	353,410	511,169	186,022
Amount	218,419,440	41,359,867	27,873,944	26,895,101	59,614,655	62,675,874
Taxable interest: Number	2,270,460	938,045	370,041	296,132	470,452	195,790
Amount	8,168,024	1,552,540	827,227	741,753	1,504,347	3,542,158
Ordinary dividends: Number	1,293,463	458,744	187,941	167,557	312,114	167,107
Amount	7,024,637	862,130	538,911	535,785	1,335,160	3,752,652
Business or profession net income (less loss):						
Number	586,799	292,388	76,428	62,761	106,135	49,087
Amount	10,385,382	2,048,088	941,379	896,970	2,434,040	4,064,906
Number of farm returns	9,266	3,076	1,315	1,302	2,148	1,425
Net capital gain (less loss) in AGI: Number	1,037,668	350,580	140,554	128,416	258,240	159,878
Amount	20,872,062	556,382	365,454	470,939	1,943,424	17,535,864
Taxable Individual Retirement Arrangements distributions: Number	326,182	150,232	58,244	43,105	55,475	19,126
Amount	4,313,665	932,671	649,949	649,521	1,251,317	830,207
Pensions and annuities in AGI: Number	726,106	349,035	126,498	91,967	121,958	36,648
Amount	13,920,913	3,866,677	2,596,374	2,286,838	3,732,833	1,438,191
Unemployment compensation: Number	316,063	195,719	46,635	32,041	35,017	6,651
Amount	1,563,742	902,581	252,292	171,782	194,525	42,564
Social Security benefits in AGI: Number	468,534	186,056	107,402	70,752	77,719	26,605
Amount	5,660,398	936,826	1,470,740	1,219,197	1,475,764	557,871
Self-employment retirement plans: Number	50,682	4,648	4,047	4,947	16,181	20,859
Amount	981,661	29,008	36,130	50,698	236,716	629,109
Total itemized deductions [6]: Number	1,914,992	524,443	361,271	312,663	513,432	203,183
Amount	54,576,726	8,849,147	7,056,980	7,172,406	15,249,615	16,248,576
State and local income taxes: Number	1,623,336	336,390	308,999	284,637	493,919	199,391
Amount	12,735,556	684,629	696,251	887,001	2,910,027	7,557,649
State and local general sales taxes: Number	259,870	160,114	49,877	27,279	18,933	3,667
Amount	269,804	101,589	59,040	43,479	41,320	24,376
Real estate taxes: Number	1,695,501	416,153	312,597	286,664	485,457	194,630
Amount	12,141,651	2,149,836	1,738,835	1,789,075	3,798,349	2,665,557
Taxes paid: Number	1,914,456	522,502	361,829	313,111	513,758	203,256
Amount	26,175,547	3,007,348	2,519,503	3,455,743	6,840,219	10,352,734
Mortgage interest paid: Number	1,485,910	331,793	277,325	260,541	442,819	173,432
Amount	18,217,041	3,096,302	2,670,969	2,772,037	5,665,417	4,012,316
Contributions: Number	1,685,720	398,346	321,035	287,733	483,613	194,993
Amount	5,833,372	640,990	658,392	663,016	1,455,131	2,415,845
Taxable income: Number	3,401,209	1,683,274	569,783	390,587	551,432	206,133
Amount	214,979,740	24,024,804	22,782,976	22,921,696	53,729,494	91,520,770
Total tax credits [7]: Number	1,378,100	579,858	231,843	201,177	267,927	97,295
Amount	1,604,136	475,045	327,044	320,701	276,681	204,666
Child tax credit: Number	730,571	293,346	157,825	135,940	143,383	77
Amount	895,318	244,875	235,565	223,266	191,533	79
Child and dependent care credit: Number	227,505	74,828	34,761	32,620	65,342	19,954
Amount	133,754	46,652	19,639	18,531	37,711	11,219
Earned income credit [8]: Number	503,616	503,616	0	0	0	0
Amount	924,057	924,057	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	434,788	434,788	0	0	0	0
Amount	805,273	805,274	0	0	0	0
Alternative minimum tax: Number	273,589	1,150	3,708	8,140	94,839	165,752
Amount	1,393,715	4,074	4,310	11,338	172,590	1,201,404
Income tax [10]: Number	3,095,373	1,409,616	543,386	385,490	550,641	206,240
Amount	43,577,647	2,564,127	3,091,802	3,256,921	9,684,526	24,980,273
Total tax liability [11]: Number	3,286,635	1,588,084	553,168	387,744	551,327	206,312
Amount	45,462,675	3,013,286	3,289,664	3,444,215	10,113,779	25,601,730
Tax due at time of filing [12]: Number	848,572	362,284	124,179	85,904	167,313	108,892
Amount	4,167,667	340,635	254,274	233,857	747,517	2,591,386
Overpayments [13]: Number	3,208,607	2,052,901	435,508	293,501	359,283	67,477
Amount	8,612,911	3,533,506	1,363,337	1,165,401	1,730,487	820,181

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
NEW MEXICO						
Number of returns	887,176	646,552	106,295	59,336	58,554	16,439
Number of joint returns	323,368	146,840	66,189	46,874	49,712	13,753
Number with paid preparer's signature	469,353	336,406	56,912	30,974	32,291	12,770
Number of exemptions	1,760,292	1,144,742	258,741	157,566	156,897	42,346
Adjusted gross income (AGI) [3]	39,282,794	11,954,451	6,516,255	5,112,746	7,717,024	7,982,317
Salaries and wages in AGI [4]: Number	731,210	522,967	92,285	51,889	50,879	13,190
Amount	26,968,795	10,209,248	4,986,250	3,812,931	5,222,003	2,738,361
Taxable interest: Number	331,892	165,943	59,202	41,578	49,449	15,720
Amount	924,097	244,315	113,998	91,456	171,634	302,696
Ordinary dividends: Number	153,572	64,818	26,345	20,502	29,625	12,282
Amount	829,031	126,701	77,923	72,760	170,431	381,216
Business or profession net income (less loss):						
Number	132,232	83,259	18,302	11,772	13,735	5,164
Amount	1,299,596	381,250	164,447	129,715	311,439	312,744
Number of farm returns	14,730	8,332	2,284	1,554	1,742	818
Net capital gain (less loss) in AGI: Number	134,822	55,303	22,337	17,712	27,015	12,455
Amount	2,781,309	152,308	106,855	132,899	417,364	1,971,882
Taxable Individual Retirement Arrangements distributions: Number	52,913	26,134	10,166	6,795	7,584	2,234
Amount	646,709	167,584	109,747	103,138	175,094	91,144
Pensions and annuities in AGI: Number	160,829	89,186	28,931	18,425	19,712	4,575
Amount	3,296,568	1,144,879	674,367	523,869	731,003	222,448
Unemployment compensation: Number	27,992	22,289	3,307	1,401	888	107
Amount	94,879	74,962	11,097	4,939	3,429	453
Social Security benefits in AGI: Number	83,593	37,273	19,675	11,381	11,459	3,805
Amount	830,505	164,741	235,152	171,685	189,363	69,563
Self-employment retirement plans: Number	5,568	1,068	707	662	1,781	1,350
Amount	85,349	6,386	6,334	7,041	27,696	37,893
Total itemized deductions [6]: Number	235,057	81,656	51,180	38,320	48,573	15,328
Amount	4,804,396	1,145,689	843,238	723,855	1,166,720	924,894
State and local income taxes: Number	195,158	54,110	44,929	35,608	46,080	14,431
Amount	880,083	69,067	99,156	114,204	249,961	347,695
State and local general sales taxes: Number	34,619	22,797	5,887	2,627	2,414	894
Amount	56,381	19,262	9,852	6,598	9,824	10,845
Real estate taxes: Number	205,272	65,114	44,911	35,141	45,663	14,443
Amount	346,906	81,365	61,575	55,140	93,801	55,023
Taxes paid: Number	234,770	80,948	51,336	38,458	48,677	15,351
Amount	1,307,747	177,324	175,706	179,743	358,639	416,336
Mortgage Interest paid: Number	201,053	65,670	45,052	34,698	43,256	12,377
Amount	2,007,132	521,571	390,283	336,150	498,837	260,292
Contributions: Number	186,110	54,955	40,786	32,567	43,595	14,207
Amount	699,364	96,275	97,046	94,673	180,140	231,233
Taxable income: Number	644,831	404,789	105,903	59,225	58,484	16,430
Amount	26,200,291	5,328,648	4,317,630	3,661,835	5,934,058	6,958,119
Total tax credits [7]: Number	271,822	161,024	48,697	29,812	25,222	7,067
Amount	281,635	116,062	75,439	47,034	26,683	16,416
Child tax credit: Number	169,954	100,254	36,335	20,776	12,585	4
Amount	199,934	84,503	61,504	36,240	17,684	4
Child and dependent care credit: Number	28,381	12,445	6,394	4,492	4,301	749
Amount	13,417	5,565	3,091	2,280	2,107	375
Earned income credit [8]: Number	200,322	200,322	0	0	0	0
Amount	384,869	384,869	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	179,571	179,571	0	0	0	0
Amount	348,714	348,714	0	0	0	0
Alternative minimum tax: Number	11,833	224	452	472	2,365	8,320
Amount	54,276	467	670	858	5,797	46,484
Income tax [10]: Number	558,521	322,780	102,032	58,871	58,412	16,426
Amount	4,434,035	535,867	544,642	507,737	1,054,426	1,791,363
Total tax liability [11]: Number	606,527	369,478	103,115	59,032	58,473	16,429
Amount	4,701,484	635,010	583,230	538,454	1,109,736	1,835,054
Tax due at time of filing [12]: Number	162,928	78,843	29,282	18,533	27,006	9,264
Amount	650,379	75,385	60,026	52,038	142,121	320,809
Overpayments [13]: Number	696,324	551,491	74,118	38,749	27,873	4,093
Amount	1,433,715	959,936	185,982	120,375	112,533	54,889

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
NEW YORK						
Number of returns	8,964,337	5,906,638	1,183,437	707,874	838,685	327,703
Number of joint returns	2,930,298	1,047,776	529,713	456,143	640,718	255,948
Number with paid preparer's signature	5,947,297	3,765,840	808,082	495,306	606,355	271,714
Number of exemptions	16,756,927	9,301,764	2,510,849	1,750,113	2,280,398	913,803
Adjusted gross income (AGI) [3]	604,209,378	112,458,055	72,713,998	61,167,728	112,171,517	245,698,082
Salaries and wages in AGI [4]: Number	7,325,354	4,591,150	1,053,571	637,582	761,269	281,782
Amount	398,946,764	96,136,968	58,083,177	48,033,372	85,491,337	111,201,908
Taxable interest: Number	4,609,140	2,147,242	813,403	575,362	756,091	317,042
Amount	21,171,255	3,297,617	1,496,113	1,273,885	2,537,384	12,566,254
Ordinary dividends: Number	2,327,753	930,612	371,269	295,893	465,326	264,653
Amount	17,797,947	1,730,236	962,710	911,914	2,231,574	11,961,513
Business or profession net income (less loss):						
Number	1,483,952	944,255	167,259	117,670	169,774	84,994
Amount	21,568,847	6,439,921	1,645,275	1,468,842	3,793,735	8,221,074
Number of farm returns	28,909	17,489	4,699	2,810	2,689	1,222
Net capital gain (less loss) in AGI: Number	1,888,011	725,835	283,954	231,133	391,699	255,390
Amount	70,037,489	1,817,610	842,178	992,356	3,577,514	62,807,831
Taxable Individual Retirement Arrangements distributions: Number	636,132	320,345	112,304	75,796	91,847	35,840
Amount	8,112,630	1,948,475	1,213,344	1,115,776	2,056,006	1,779,028
Pensions and annuities in AGI: Number	1,500,686	790,124	262,383	176,511	209,650	62,018
Amount	30,557,949	9,233,240	5,679,193	4,864,254	7,746,765	3,034,497
Unemployment compensation: Number	470,697	314,623	69,802	40,893	38,653	6,726
Amount	1,889,631	1,198,550	301,130	177,571	177,016	35,365
Social Security benefits in AGI: Number	899,667	381,244	204,446	125,382	135,818	52,777
Amount	10,552,735	1,881,312	2,793,616	2,141,082	2,591,479	1,145,246
Self-employment retirement plans: Number	101,901	12,473	9,169	9,889	28,608	41,762
Amount	2,141,710	80,904	83,353	106,472	446,840	1,424,143
Total itemized deductions [6]: Number	3,442,241	1,031,816	736,215	568,137	783,466	322,607
Amount	105,092,849	16,701,249	13,317,202	12,281,142	23,313,383	39,479,874
State and local income taxes: Number	3,058,911	795,446	670,740	530,778	748,663	313,284
Amount	35,121,938	2,024,713	2,589,151	2,822,285	6,606,986	21,078,802
State and local general sales taxes: Number	336,818	197,627	61,478	35,486	33,305	8,922
Amount	490,479	185,764	92,422	64,478	86,997	60,817
Real estate taxes: Number	2,543,653	636,726	513,156	451,054	664,564	278,153
Amount	15,949,368	2,694,220	2,287,199	2,355,551	4,583,187	4,029,211
Taxes paid: Number	3,442,109	1,028,956	737,591	568,912	783,987	322,663
Amount	60,542,014	5,827,533	5,040,825	5,297,983	11,366,988	33,008,685
Mortgage Interest paid: Number	2,301,198	560,530	468,080	413,874	603,948	254,766
Amount	27,987,821	5,098,107	4,069,802	3,863,141	7,095,570	7,861,197
Contributions: Number	3,045,835	810,790	661,250	524,606	740,814	308,375
Amount	15,455,586	1,545,104	1,499,958	1,321,511	2,476,584	8,612,429
Taxable income: Number	6,874,423	3,831,254	1,173,964	705,413	836,873	326,919
Amount	431,231,923	54,467,762	47,534,622	41,861,425	81,098,428	206,269,685
Total tax credits [7]: Number	2,739,755	1,374,662	473,711	346,085	383,709	161,588
Amount	3,632,064	1,116,732	682,431	541,503	393,639	897,758
Child tax credit: Number	1,399,134	653,628	323,758	227,375	194,225	148
Amount	1,683,586	550,594	491,642	374,100	267,070	182
Child and dependent care credit: Number	488,869	248,460	79,137	55,970	80,808	24,494
Amount	296,785	157,239	46,910	31,524	46,226	14,885
Earned income credit [8]: Number	1,548,208	1,548,208	0	0	0	0
Amount	2,902,778	2,902,779	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	1,309,011	1,309,011	0	0	0	0
Amount	2,441,113	2,441,114	0	0	0	0
Alternative minimum tax: Number	493,391	2,708	12,212	24,470	190,518	263,483
Amount	3,271,930	15,719	14,040	32,227	381,328	2,828,615
Income tax [10]: Number	6,157,862	3,171,545	1,126,515	696,784	835,686	327,332
Amount	89,771,971	5,727,548	6,452,848	6,089,783	14,927,966	56,573,823
Total tax liability [11]: Number	6,795,812	3,788,922	1,141,954	700,510	836,936	327,490
Amount	93,820,753	6,972,426	6,809,392	6,396,890	15,591,957	58,050,088
Tax due at time of filing [12]: Number	1,734,562	879,507	255,169	161,160	269,256	169,470
Amount	8,097,315	829,949	527,927	450,556	1,293,646	4,995,239
Overpayments [13]: Number	6,881,956	4,844,597	899,076	523,338	522,689	92,256
Amount	17,691,839	8,805,905	2,707,959	2,002,240	2,480,254	1,695,481

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
NORTH CAROLINA						
Number of returns	4,005,613	2,787,435	516,987	299,879	303,554	97,758
Number of joint returns	1,597,379	641,086	351,212	251,459	267,317	86,305
Number with paid preparer's signature	2,429,130	1,680,701	313,271	176,313	181,465	77,380
Number of exemptions	8,250,747	5,044,207	1,258,450	806,232	855,971	285,887
Adjusted gross income (AGI) [3]	203,102,967	56,006,658	31,769,742	25,861,101	40,168,886	49,296,579
Salaries and wages in AGI [4]: Number	3,429,613	2,343,882	461,509	269,203	271,873	83,146
Amount	143,551,120	47,651,159	24,812,950	19,851,274	29,227,849	22,007,886
Taxable interest: Number	1,625,149	754,576	304,119	217,163	255,774	93,517
Amount	4,462,476	1,082,827	514,514	430,494	779,447	1,655,195
Ordinary dividends: Number	816,622	320,775	138,679	113,193	166,315	77,660
Amount	4,488,753	589,966	385,261	389,238	917,321	2,206,968
Business or profession net income (less loss):						
Number	644,773	394,665	96,079	60,361	66,889	26,779
Amount	6,265,575	1,629,930	828,187	663,248	1,400,259	1,743,952
Number of farm returns	49,085	25,366	9,020	5,699	6,114	2,886
Net capital gain (less loss) in AGI: Number	701,927	269,470	113,058	93,948	147,811	77,640
Amount	14,625,279	680,598	484,332	571,145	1,930,755	10,958,449
Taxable Individual Retirement Arrangements distributions: Number	293,248	149,322	55,634	37,188	39,276	11,828
Amount	3,656,434	987,062	639,089	581,217	959,210	489,856
Pensions and annuities in AGI: Number	718,096	388,606	135,621	86,644	85,747	21,478
Amount	12,754,978	4,324,723	2,661,081	2,162,165	2,761,456	845,554
Unemployment compensation: Number	211,124	160,622	29,728	12,250	7,651	873
Amount	739,145	531,798	114,100	51,417	36,917	4,914
Social Security benefits in AGI: Number	393,994	179,435	93,006	53,598	50,455	17,500
Amount	4,152,913	823,822	1,195,557	885,849	905,676	342,009
Self-employment retirement plans: Number	27,770	3,654	2,933	3,136	8,582	9,465
Amount	443,151	19,123	22,272	27,945	116,134	257,677
Total itemized deductions [6]: Number	1,478,030	526,752	327,221	245,483	283,166	95,408
Amount	33,251,592	7,896,979	5,623,455	4,903,480	7,705,152	7,122,528
State and local income taxes: Number	1,314,746	409,376	304,395	234,249	273,997	92,729
Amount	8,430,697	964,892	1,021,538	1,126,486	2,160,805	3,156,975
State and local general sales taxes: Number	138,546	95,678	21,003	10,532	8,699	2,634
Amount	176,950	77,327	29,923	19,790	24,566	25,342
Real estate taxes: Number	1,312,085	423,717	296,632	230,097	270,110	91,529
Amount	2,734,471	613,585	465,029	424,351	707,542	523,964
Taxes paid: Number	1,478,872	526,137	327,995	245,879	283,386	95,475
Amount	11,772,338	1,756,856	1,613,747	1,637,981	2,991,817	3,771,937
Mortgage Interest paid: Number	1,255,020	406,940	289,023	222,536	254,655	81,866
Amount	11,732,126	2,725,210	2,254,802	1,946,558	2,874,392	1,931,162
Contributions: Number	1,272,781	408,874	283,949	221,991	266,033	91,934
Amount	5,623,142	981,294	861,885	784,338	1,261,764	1,733,862
Taxable income: Number	3,051,286	1,836,713	514,496	299,328	303,101	97,648
Amount	133,351,175	24,191,754	20,258,062	17,757,036	29,460,642	41,683,682
Total tax credits [7]: Number	1,328,036	743,506	236,936	157,786	143,886	45,922
Amount	1,387,203	532,621	356,840	250,841	152,152	94,748
Child tax credit: Number	801,033	438,578	174,089	110,693	77,641	32
Amount	912,897	351,914	274,412	182,599	103,950	24
Child and dependent care credit: Number	220,825	95,089	47,984	35,962	34,719	7,071
Amount	109,868	46,966	23,724	18,555	17,140	3,485
Earned income credit [8]: Number	802,542	802,542	0	0	0	0
Amount	1,601,036	1,601,035	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	717,675	717,675	0	0	0	0
Amount	1,444,008	1,444,007	0	0	0	0
Alternative minimum tax: Number	98,871	865	1,648	2,173	22,145	72,040
Amount	516,285	3,421	2,290	4,003	44,605	461,966
Income tax [10]: Number	2,638,255	1,445,738	494,795	297,275	302,753	97,694
Amount	22,977,310	2,416,430	2,479,807	2,358,992	5,112,224	10,609,856
Total tax liability [11]: Number	2,863,216	1,662,763	501,486	298,152	303,092	97,723
Amount	24,364,254	2,913,741	2,682,539	2,516,471	5,385,112	10,866,389
Tax due at time of filing [12]: Number	770,784	361,033	139,652	87,930	126,620	55,549
Amount	3,235,511	369,545	280,142	239,500	636,318	1,710,007
Overpayments [13]: Number	3,120,884	2,361,037	366,405	203,427	162,417	27,598
Amount	6,912,328	4,358,584	920,952	621,548	664,016	347,229

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
NORTH DAKOTA						
Number of returns	314,622	219,467	46,450	25,483	18,008	5,214
Number of joint returns	132,285	52,397	36,143	22,903	16,249	4,593
Number with paid preparer's signature	190,604	125,696	30,581	16,904	12,852	4,571
Number of exemptions	583,113	319,073	122,111	74,245	52,770	14,914
Adjusted gross income (AGI) [3]	14,228,763	4,192,976	2,866,114	2,185,887	2,327,932	2,655,854
Salaries and wages in AGI [4]: Number	266,637	181,578	41,626	23,108	15,858	4,467
Amount	9,779,934	3,474,872	2,198,489	1,644,187	1,523,422	938,964
Taxable interest: Number	161,278	89,297	31,096	19,983	15,851	5,051
Amount	407,994	136,196	59,301	44,123	61,297	107,075
Ordinary dividends: Number	75,599	36,366	14,371	10,662	10,170	4,030
Amount	223,254	47,665	29,399	25,425	45,710	75,054
Business or profession net income (less loss):						
Number	47,704	27,257	9,177	5,413	4,265	1,592
Amount	494,293	144,822	80,141	67,323	97,137	104,871
Number of farm returns	28,852	18,063	5,128	2,853	2,171	637
Net capital gain (less loss) in AGI: Number	72,750	36,234	13,121	9,581	9,688	4,126
Amount	914,099	93,084	60,852	60,068	137,049	563,047
Taxable Individual Retirement Arrangements distributions: Number	24,674	14,399	4,785	2,733	2,205	552
Amount	222,526	76,786	44,774	37,327	45,852	17,786
Pensions and annuities in AGI: Number	46,348	27,063	9,183	5,342	3,837	923
Amount	648,553	265,810	152,281	107,027	97,574	25,861
Unemployment compensation: Number	14,100	9,342	3,105	1,203	419	31
Amount	40,258	24,962	9,705	4,001	1,476	114
Social Security benefits in AGI: Number	33,384	17,054	8,097	4,076	3,195	962
Amount	311,852	75,537	100,646	63,592	53,922	18,155
Self-employment retirement plans: Number	2,483	443	391	511	710	428
Amount	30,221	2,285	2,917	4,601	9,806	10,611
Total itemized deductions [6]: Number	61,954	20,510	13,556	11,383	11,987	4,518
Amount	1,235,353	284,018	205,633	191,830	300,766	253,106
State and local income taxes: Number	46,666	10,760	10,701	9,938	10,964	4,303
Amount	175,919	9,593	15,095	19,095	40,099	92,038
State and local general sales taxes: Number	14,494	8,934	2,863	1,473	1,012	212
Amount	13,971	5,302	3,213	2,409	2,309	738
Real estate taxes: Number	52,468	14,874	11,803	10,476	11,192	4,123
Amount	173,084	34,455	32,363	34,378	45,265	26,622
Taxes paid: Number	61,916	20,284	13,658	11,452	12,004	4,518
Amount	367,357	50,268	51,452	56,630	88,666	120,340
Mortgage Interest paid: Number	46,707	12,127	10,910	9,922	10,334	3,414
Amount	359,875	69,566	73,203	72,720	86,626	57,760
Contributions: Number	49,704	13,903	10,512	9,933	11,072	4,284
Amount	206,160	27,742	26,160	28,059	46,412	77,787
Taxable income: Number	250,861	155,832	46,360	25,462	17,996	5,211
Amount	9,880,333	2,135,497	1,935,260	1,604,743	1,839,516	2,365,316
Total tax credits [7]: Number	104,363	53,686	24,280	14,999	8,988	2,410
Amount	121,056	38,251	40,768	26,300	10,464	5,275
Child tax credit: Number	55,160	23,171	17,145	9,910	4,928	6
Amount	76,498	21,419	29,631	18,028	7,414	5
Child and dependent care credit: Number	17,944	6,274	5,799	3,476	2,062	333
Amount	8,372	2,902	2,845	1,597	873	155
Earned income credit [8]: Number	40,433	40,433	0	0	0	0
Amount	68,292	68,292	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	34,346	34,346	0	0	0	0
Amount	60,528	60,528	0	0	0	0
Alternative minimum tax: Number	3,651	73	116	140	674	2,648
Amount	14,974	140	173	225	1,669	12,764
Income tax [10]: Number	227,047	133,732	44,782	25,346	17,976	5,211
Amount	1,575,940	222,426	226,046	208,010	319,688	599,771
Total tax liability [11]: Number	243,457	149,439	45,427	25,395	17,985	5,211
Amount	1,703,855	268,433	250,750	228,414	343,685	612,572
Tax due at time of filing [12]: Number	73,792	38,350	14,479	8,807	9,058	3,098
Amount	313,283	43,570	38,071	34,854	67,326	129,461
Overpayments [13]: Number	231,113	175,394	30,626	15,811	7,930	1,352
Amount	409,953	245,561	72,819	44,872	29,682	17,019

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
OHIO	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	5,520,709	3,816,769	791,312	438,771	370,107	103,750
Number of joint returns	1,958,289	755,764	460,104	343,141	310,631	88,649
Number with paid preparer's signature	2,957,549	1,986,429	447,290	239,463	204,041	80,326
Number of exemptions	10,345,326	5,897,107	1,860,115	1,197,726	1,080,351	310,027
Adjusted gross income (AGI) [3]	266,209,812	78,509,917	48,541,319	37,778,156	48,227,315	53,153,104
Salaries and wages in AGI [4]: Number	4,710,621	3,166,496	713,717	403,177	336,873	90,358
Amount	193,757,936	64,013,220	38,687,415	30,277,494	36,263,579	24,516,226
Taxable interest: Number	2,400,248	1,230,632	460,546	306,608	303,970	98,492
Amount	5,878,092	1,740,502	819,610	606,022	937,032	1,774,925
Ordinary dividends: Number	1,290,972	581,362	240,897	176,449	207,781	84,483
Amount	5,875,638	908,018	582,249	529,210	1,114,055	2,742,107
Business or profession net income (less loss):						
Number	725,098	421,424	122,049	76,487	75,977	29,161
Amount	7,958,371	2,153,458	1,074,357	893,826	1,748,748	2,087,980
Number of farm returns	74,362	41,443	14,856	8,819	6,862	2,382
Net capital gain (less loss) in AGI: Number	998,310	431,378	178,473	134,099	173,290	81,070
Amount	14,147,229	801,604	607,991	663,111	1,805,282	10,269,240
Taxable Individual Retirement Arrangements distributions: Number	453,105	260,602	83,517	49,980	46,143	12,863
Amount	5,318,934	1,657,264	984,432	827,722	1,207,349	642,167
Pensions and annuities in AGI: Number	1,089,021	668,364	191,823	110,953	95,901	21,980
Amount	18,781,941	8,193,123	4,018,962	2,690,016	2,987,076	892,766
Unemployment compensation: Number	275,053	188,464	48,769	23,920	12,793	1,107
Amount	964,241	654,384	176,110	83,440	45,808	4,500
Social Security benefits in AGI: Number	535,258	278,039	123,598	62,946	53,206	17,469
Amount	4,928,023	1,258,058	1,492,531	946,904	884,088	346,442
Self-employment retirement plans: Number	37,233	5,409	4,516	4,831	11,636	10,841
Amount	568,860	28,485	33,112	43,835	164,762	298,667
Total itemized deductions [6]: Number	1,919,290	671,182	471,089	338,736	336,993	101,290
Amount	37,979,467	8,491,709	7,232,706	6,233,414	8,454,842	7,566,795
State and local income taxes: Number	1,775,431	559,594	453,130	331,436	331,446	99,825
Amount	10,865,170	1,100,441	2,008,737	1,556,192	2,574,465	3,625,336
State and local general sales taxes: Number	123,523	92,374	17,218	7,183	5,368	1,380
Amount	156,578	76,879	29,675	18,019	18,651	13,352
Real estate taxes: Number	1,706,078	549,099	423,764	317,292	319,382	96,541
Amount	5,425,083	1,123,100	1,421,794	885,750	1,222,575	771,862
Taxes paid: Number	1,918,662	668,839	471,992	339,271	337,235	101,325
Amount	16,591,815	2,332,855	3,487,305	2,481,280	3,844,074	4,446,301
Mortgage Interest paid: Number	1,636,707	533,077	415,073	307,150	298,131	83,276
Amount	13,310,350	3,359,498	2,972,166	2,488,324	2,936,983	1,553,379
Contributions: Number	1,542,523	460,315	380,913	294,102	310,412	96,781
Amount	5,235,534	761,730	790,156	727,499	1,132,282	1,823,866
Taxable income: Number	4,349,608	2,649,159	788,932	438,183	369,704	103,630
Amount	178,871,881	38,909,871	32,311,744	26,606,808	35,921,720	45,121,737
Total tax credits [7]: Number	1,741,394	895,835	368,989	240,386	185,735	50,449
Amount	1,948,911	679,851	557,257	399,807	208,109	103,887
Child tax credit: Number	1,021,915	497,535	260,234	160,931	103,159	56
Amount	1,323,612	458,749	425,765	284,564	154,484	50
Child and dependent care credit: Number	176,020	63,380	39,731	34,390	33,193	5,326
Amount	85,889	29,486	18,649	17,604	17,421	2,729
Earned income credit [8]: Number	834,951	834,951	0	0	0	0
Amount	1,554,476	1,554,476	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	740,123	740,123	0	0	0	0
Amount	1,395,670	1,395,670	0	0	0	0
Alternative minimum tax: Number	138,775	1,335	4,957	7,263	45,139	80,081
Amount	663,825	3,044	4,716	8,291	82,803	564,971
Income tax [10]: Number	3,945,160	2,275,550	761,339	435,276	369,325	103,670
Amount	30,242,439	4,193,862	4,149,300	3,639,879	6,351,843	11,907,553
Total tax liability [11]: Number	4,175,430	2,495,669	770,004	436,404	369,647	103,706
Amount	31,832,120	4,734,574	4,396,804	3,840,910	6,676,508	12,183,327
Tax due at time of filing [12]: Number	948,466	486,119	174,054	102,733	131,284	54,276
Amount	3,129,052	429,426	330,228	270,057	617,856	1,481,184
Overpayments [13]: Number	4,398,842	3,228,272	599,031	323,034	218,365	30,140
Amount	9,246,843	5,230,008	1,632,648	1,097,987	917,099	369,102

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
OKLAHOMA						
Number of returns	1,544,498	1,103,725	204,163	109,315	96,949	30,346
Number of joint returns	669,885	315,732	148,129	93,768	86,094	26,162
Number with paid preparer's signature	940,709	654,198	129,278	68,357	63,377	25,499
Number of exemptions	3,168,452	1,989,988	523,068	301,272	270,072	84,052
Adjusted gross income (AGI) [3]	74,932,461	21,353,014	12,527,833	9,408,323	12,647,678	18,995,613
Salaries and wages in AGI [4]: Number	1,292,679	904,474	180,274	97,380	85,369	25,182
Amount	50,313,595	18,127,375	9,828,399	7,209,419	8,796,676	6,351,727
Taxable interest: Number	610,560	309,897	114,059	77,081	80,736	28,787
Amount	1,871,692	482,537	214,224	163,657	272,338	738,936
Ordinary dividends: Number	260,684	112,477	46,390	34,840	45,019	21,958
Amount	1,235,101	165,315	98,540	90,796	200,999	679,450
Business or profession net income (less loss):						
Number	268,068	165,386	40,890	24,643	25,608	11,541
Amount	2,725,480	818,975	318,146	254,015	538,988	795,355
Number of farm returns	80,893	45,109	15,289	9,089	8,079	3,327
Net capital gain (less loss) in AGI: Number	233,750	100,218	39,861	30,084	41,407	22,180
Amount	5,965,173	263,439	160,111	176,208	492,389	4,873,026
Taxable Individual Retirement Arrangements distributions: Number	106,905	56,957	20,377	12,793	12,965	3,813
Amount	1,308,287	377,225	235,503	210,232	328,445	156,882
Pensions and annuities in AGI: Number	279,228	161,502	51,666	30,981	28,507	6,572
Amount	4,702,976	1,937,394	1,005,633	707,461	812,961	239,527
Unemployment compensation: Number	46,040	35,237	6,225	2,658	1,730	190
Amount	138,917	104,719	19,119	8,489	5,899	690
Social Security benefits in AGI: Number	161,395	77,785	38,286	20,479	18,380	6,465
Amount	1,582,465	342,880	470,299	323,177	319,454	126,657
Self-employment retirement plans: Number	7,645	1,146	825	899	2,321	2,454
Amount	122,481	5,740	6,473	8,391	34,330	67,550
Total itemized deductions [6]: Number	470,237	164,712	109,898	80,614	86,019	28,994
Amount	9,834,422	2,361,851	1,687,981	1,427,352	2,029,964	2,327,273
State and local income taxes: Number	398,495	112,511	99,677	76,287	82,380	27,640
Amount	2,279,777	287,974	283,335	309,231	539,768	859,469
State and local general sales taxes: Number	69,113	48,954	10,589	4,567	3,655	1,348
Amount	99,561	46,421	18,112	11,220	11,385	12,424
Real estate taxes: Number	405,675	127,406	96,851	74,159	80,547	26,712
Amount	641,100	137,381	118,895	107,550	162,008	115,269
Taxes paid: Number	472,767	165,641	110,806	81,069	86,227	29,024
Amount	3,074,433	484,378	430,684	437,119	724,438	997,813
Mortgage Interest paid: Number	369,187	114,380	90,714	69,605	72,808	21,680
Amount	2,831,771	778,486	557,879	477,784	610,090	407,532
Contributions: Number	389,570	121,034	91,746	70,888	78,588	27,314
Amount	2,337,650	315,879	297,888	271,304	424,779	1,027,800
Taxable income: Number	1,156,321	716,458	203,540	109,183	96,837	30,303
Amount	50,814,777	9,484,785	8,220,525	6,699,426	9,619,219	16,790,822
Total tax credits [7]: Number	477,945	274,106	96,071	55,430	40,302	12,036
Amount	557,496	205,051	157,241	93,059	47,953	54,192
Child tax credit: Number	307,094	168,731	74,758	40,318	23,279	8
Amount	373,143	145,126	125,492	69,767	32,751	6
Child and dependent care credit: Number	61,450	25,404	16,414	10,292	8,130	1,210
Amount	29,149	11,354	7,971	5,196	4,036	591
Earned income credit [8]: Number	318,312	318,312	0	0	0	0
Amount	622,296	622,295	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	282,784	282,784	0	0	0	0
Amount	554,085	554,084	0	0	0	0
Alternative minimum tax: Number	23,694	375	719	879	4,709	17,012
Amount	108,252	1,459	1,101	1,917	10,639	93,135
Income tax [10]: Number	1,009,205	577,772	195,953	108,480	96,704	30,296
Amount	9,029,858	949,296	994,776	902,597	1,697,813	4,485,378
Total tax liability [11]: Number	1,102,851	668,597	198,344	108,799	96,790	30,321
Amount	9,563,971	1,149,124	1,072,414	962,044	1,796,176	4,584,215
Tax due at time of filing [12]: Number	305,224	150,932	57,347	35,209	44,806	16,930
Amount	1,331,856	153,707	123,452	104,802	250,173	699,721
Overpayments [13]: Number	1,196,330	929,239	142,196	70,666	46,637	7,592
Amount	2,530,699	1,638,374	355,362	209,007	183,181	144,775

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
OREGON						
Number of returns	1,695,185	1,132,417	244,026	139,543	137,259	41,940
Number of joint returns	707,954	280,035	159,788	113,650	118,501	35,980
Number with paid preparer's signature	858,910	528,239	134,191	78,370	83,924	34,186
Number of exemptions	3,318,336	1,872,458	585,475	367,379	375,996	117,028
Adjusted gross income (AGI) [3]	88,482,771	22,464,190	15,002,916	12,028,978	18,079,097	20,907,590
Salaries and wages in AGI [4]: Number	1,388,791	906,756	209,407	120,844	118,190	33,594
Amount	58,569,425	18,499,217	11,304,040	8,862,691	12,225,042	7,678,436
Taxable interest: Number	796,746	383,429	152,536	103,569	117,088	40,124
Amount	2,519,850	656,343	301,880	237,134	423,768	900,727
Ordinary dividends: Number	404,761	173,358	70,775	54,291	74,269	32,068
Amount	2,104,112	358,825	204,036	184,046	389,158	968,047
Business or profession net income (less loss):						
Number	267,495	154,414	44,340	27,025	30,363	11,353
Amount	3,353,363	889,411	475,024	385,151	784,101	819,675
Number of farm returns	35,431	16,484	6,372	4,686	5,268	2,621
Net capital gain (less loss) in AGI: Number	367,997	154,346	61,493	48,471	70,687	33,000
Amount	7,926,611	458,922	306,607	358,996	1,184,609	5,617,477
Taxable Individual Retirement Arrangements distributions: Number	142,249	75,654	26,634	17,231	17,576	5,154
Amount	1,730,124	501,566	307,933	272,981	420,704	226,940
Pensions and annuities in AGI: Number	305,692	169,495	56,937	35,639	34,916	8,705
Amount	6,114,968	2,027,259	1,323,215	1,058,595	1,346,785	359,113
Unemployment compensation: Number	121,533	87,110	19,826	8,567	5,282	748
Amount	412,447	278,610	73,014	33,531	23,462	3,831
Social Security benefits in AGI: Number	190,330	84,673	45,603	26,578	25,065	8,411
Amount	1,966,364	391,111	572,296	419,105	427,903	155,948
Self-employment retirement plans: Number	17,822	3,124	2,331	2,335	5,556	4,476
Amount	283,040	18,929	19,505	23,150	88,623	132,832
Total itemized deductions [6]: Number	707,422	247,372	169,252	120,296	129,865	40,637
Amount	16,690,671	3,909,455	3,092,973	2,611,436	3,779,640	3,297,166
State and local income taxes: Number	659,187	207,402	165,328	118,523	128,124	39,810
Amount	4,605,771	467,738	655,127	680,464	1,196,733	1,605,708
State and local general sales taxes: Number	5,108	2,328	933	602	749	496
Amount	29,245	2,641	2,020	1,970	4,706	17,908
Real estate taxes: Number	629,699	206,788	151,088	110,633	122,355	38,835
Amount	1,757,186	436,314	345,251	294,263	428,952	252,405
Taxes paid: Number	702,962	242,625	169,430	120,390	129,878	40,639
Amount	6,466,597	923,702	1,015,854	987,138	1,644,907	1,894,994
Mortgage Interest paid: Number	595,091	193,635	147,395	106,784	113,588	33,689
Amount	6,455,113	1,687,275	1,394,403	1,112,372	1,444,488	816,572
Contributions: Number	571,746	172,169	138,024	104,313	118,846	38,394
Amount	2,052,685	302,458	299,501	271,348	443,991	735,387
Taxable income: Number	1,318,646	758,103	242,433	139,204	137,042	41,864
Amount	58,056,736	10,352,358	9,314,004	8,021,493	12,997,243	17,371,639
Total tax credits [7]: Number	510,606	254,425	106,424	69,926	61,601	18,230
Amount	556,600	180,333	158,280	109,704	66,301	41,983
Child tax credit: Number	288,208	133,705	75,752	46,856	31,873	22
Amount	361,243	114,563	122,641	79,981	44,037	20
Child and dependent care credit: Number	68,100	26,962	16,135	11,474	11,191	2,338
Amount	31,809	12,409	7,378	5,597	5,312	1,112
Earned income credit [8]: Number	234,892	234,892	0	0	0	0
Amount	403,183	403,182	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	201,985	201,985	0	0	0	0
Amount	354,490	354,489	0	0	0	0
Alternative minimum tax: Number	48,753	400	690	1,195	13,749	32,719
Amount	304,114	1,073	1,391	2,151	27,388	272,110
Income tax [10]: Number	1,183,435	637,453	229,732	137,630	136,746	41,874
Amount	9,928,326	1,089,871	1,151,635	1,066,702	2,228,420	4,391,698
Total tax liability [11]: Number	1,269,417	718,704	233,698	138,209	136,914	41,892
Amount	10,594,196	1,313,456	1,254,315	1,147,275	2,369,529	4,509,619
Tax due at time of filing [12]: Number	384,162	189,689	71,392	42,137	57,308	23,636
Amount	1,566,391	189,428	146,032	121,272	312,184	797,474
Overpayments [13]: Number	1,239,185	900,294	165,294	91,941	70,907	10,749
Amount	2,426,514	1,298,232	405,272	277,747	296,525	148,739

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
PENNSYLVANIA						
Number of returns	6,040,716	4,046,416	850,915	499,385	492,358	151,642
Number of joint returns	2,369,785	851,099	544,999	409,491	431,428	132,768
Number with paid preparer's signature	3,308,869	2,125,838	490,479	285,586	289,487	117,479
Number of exemptions	11,269,558	6,007,670	2,019,079	1,356,305	1,430,083	456,421
Adjusted gross income (AGI) [3]	320,781,502	78,653,587	52,344,930	43,069,519	64,873,906	81,839,560
Salaries and wages in AGI [4]: Number	4,962,377	3,173,758	758,994	452,027	446,151	131,447
Amount	225,758,230	62,983,525	41,327,199	34,018,369	49,196,487	38,232,650
Taxable interest: Number	3,045,419	1,544,445	550,496	381,686	424,102	144,690
Amount	8,211,353	2,263,004	975,947	773,713	1,282,041	2,916,650
Ordinary dividends: Number	1,660,030	753,767	280,855	215,018	285,496	124,894
Amount	8,331,325	1,278,665	729,925	682,889	1,481,833	4,158,012
Business or profession net income (less loss):						
Number	767,835	420,100	124,429	82,595	97,894	42,817
Amount	11,465,280	2,781,048	1,400,238	1,200,842	2,608,807	3,474,345
Number of farm returns	42,924	26,426	6,880	3,992	3,750	1,876
Net capital gain (less loss) in AGI: Number	1,246,536	533,755	199,505	158,734	234,617	119,925
Amount	22,494,209	975,301	686,315	794,828	2,435,752	17,602,012
Taxable Individual Retirement Arrangements distributions: Number	556,630	321,558	95,227	60,670	60,841	18,334
Amount	6,191,228	1,880,754	1,081,053	954,917	1,451,940	822,565
Pensions and annuities in AGI: Number	1,233,872	744,933	206,507	127,453	123,150	31,829
Amount	19,443,869	7,630,622	3,867,283	2,947,659	3,713,843	1,284,461
Unemployment compensation: Number	474,824	320,871	85,891	40,148	24,594	3,320
Amount	1,894,569	1,194,208	366,865	184,406	128,285	20,804
Social Security benefits in AGI: Number	654,849	317,623	151,478	83,997	75,972	25,779
Amount	6,766,127	1,447,889	1,978,375	1,400,409	1,403,499	535,954
Self-employment retirement plans: Number	51,067	6,695	5,389	6,138	16,057	16,788
Amount	820,631	36,030	41,559	56,110	223,117	463,814
Total itemized deductions [6]: Number	1,953,921	580,309	440,126	354,925	432,558	146,003
Amount	42,475,881	8,613,473	7,168,312	6,708,938	10,720,601	9,264,555
State and local income taxes: Number	1,792,835	479,202	412,290	339,619	418,656	143,068
Amount	9,360,640	980,699	1,197,836	1,340,283	2,534,284	3,307,537
State and local general sales taxes: Number	141,171	83,155	26,413	15,015	13,615	2,973
Amount	177,263	64,691	37,863	23,715	29,931	21,062
Real estate taxes: Number	1,772,721	477,114	401,919	336,688	415,986	141,014
Amount	6,977,166	1,321,630	1,218,441	1,195,301	1,963,656	1,278,141
Taxes paid: Number	1,957,377	580,454	441,640	355,947	433,158	146,178
Amount	16,789,080	2,423,202	2,500,736	2,600,863	4,593,371	4,670,907
Mortgage Interest paid: Number	1,617,231	423,637	375,781	316,505	381,032	120,276
Amount	14,483,043	2,834,407	2,769,683	2,589,763	3,855,868	2,433,321
Contributions: Number	1,675,422	431,729	375,868	319,391	407,182	141,252
Amount	6,270,304	773,043	812,120	787,817	1,408,387	2,488,936
Taxable income: Number	4,674,343	2,684,610	847,818	498,539	491,872	151,504
Amount	224,385,950	38,450,973	34,794,056	30,460,048	48,871,919	71,808,954
Total tax credits [7]: Number	1,880,594	887,547	391,088	276,269	249,019	76,671
Amount	2,140,344	666,144	586,433	449,164	260,486	178,117
Child tax credit: Number	1,027,208	448,653	266,553	180,352	131,574	76
Amount	1,330,213	400,723	433,642	309,972	185,790	86
Child and dependent care credit: Number	221,471	78,012	45,534	39,626	47,630	10,669
Amount	115,565	40,999	22,547	20,924	25,448	5,647
Earned income credit [8]: Number	813,171	813,171	0	0	0	0
Amount	1,441,183	1,441,184	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	710,094	710,094	0	0	0	0
Amount	1,291,948	1,291,949	0	0	0	0
Alternative minimum tax: Number	152,705	1,140	2,545	4,102	41,452	103,466
Amount	653,642	3,990	3,054	6,008	72,467	568,122
Income tax [10]: Number	4,250,275	2,294,408	817,990	494,984	491,339	151,554
Amount	39,844,090	4,119,217	4,400,981	4,113,198	8,618,896	18,591,799
Total tax liability [11]: Number	4,478,937	2,512,207	827,098	496,370	491,682	151,580
Amount	41,834,322	4,720,373	4,689,660	4,353,614	9,048,809	19,021,866
Tax due at time of filing [12]: Number	1,017,339	475,867	177,032	110,763	172,149	81,528
Amount	4,199,343	423,653	335,543	286,111	774,757	2,379,279
Overpayments [13]: Number	4,795,310	3,430,824	652,786	372,714	294,216	44,770
Amount	10,262,283	5,335,067	1,802,274	1,289,340	1,237,819	597,784

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
RHODE ISLAND						
Number of returns	516,906	340,573	71,203	43,699	48,044	13,387
Number of joint returns	183,296	56,764	39,330	34,166	41,555	11,481
Number with paid preparer's signature	317,230	199,621	46,490	28,436	31,607	11,076
Number of exemptions	933,693	486,174	157,462	114,648	136,589	38,820
Adjusted gross income (AGI) [3]	28,128,464	6,723,748	4,385,085	3,776,882	6,335,358	6,907,391
Salaries and wages in AGI [4]: Number	433,740	274,193	63,774	39,970	44,157	11,646
Amount	19,919,037	5,618,102	3,478,622	2,995,167	4,798,572	3,028,574
Taxable interest: Number	266,931	122,322	51,468	36,410	43,733	12,998
Amount	703,537	172,592	87,274	69,594	121,430	252,646
Ordinary dividends: Number	124,909	49,339	21,496	17,362	26,040	10,672
Amount	625,849	84,454	52,364	52,234	120,894	315,901
Business or profession net income (less loss):						
Number	69,386	36,956	10,696	7,793	10,112	3,829
Amount	1,054,340	290,314	124,703	107,515	238,982	292,827
Number of farm returns	662	316	110	66	118	52
Net capital gain (less loss) in AGI: Number	97,345	35,910	15,872	13,268	21,866	10,429
Amount	2,140,666	68,740	53,715	66,292	248,620	1,703,299
Taxable Individual Retirement Arrangements distributions: Number	40,572	21,950	7,159	4,773	5,144	1,546
Amount	431,715	127,169	70,683	64,179	109,198	60,485
Pensions and annuities in AGI: Number	86,422	46,059	15,658	10,168	11,711	2,826
Amount	1,663,619	519,566	341,342	270,023	413,514	119,172
Unemployment compensation: Number	42,711	28,244	7,161	4,008	2,889	409
Amount	189,105	116,975	34,542	19,687	15,374	2,528
Social Security benefits in AGI: Number	52,302	23,299	12,508	7,226	6,957	2,312
Amount	548,191	106,822	157,733	113,967	122,737	46,931
Self-employment retirement plans: Number	5,137	721	575	630	1,688	1,523
Amount	79,956	4,172	4,601	5,995	22,930	42,259
Total itemized deductions [6]: Number	195,839	58,065	44,169	35,300	45,190	13,115
Amount	4,556,739	895,618	784,857	718,181	1,193,960	964,123
State and local income taxes: Number	178,296	45,198	41,983	34,224	44,132	12,759
Amount	1,048,809	75,089	115,277	133,219	290,306	434,916
State and local general sales taxes: Number	15,574	10,973	2,162	1,073	1,018	348
Amount	21,834	8,566	3,790	2,542	3,459	3,476
Real estate taxes: Number	180,951	50,129	41,068	33,539	43,555	12,660
Amount	763,424	157,677	142,514	129,049	214,450	119,733
Taxes paid: Number	196,099	58,069	44,298	35,382	45,224	13,126
Amount	1,969,261	261,223	283,196	285,674	540,198	598,970
Mortgage Interest paid: Number	165,994	45,265	38,314	31,515	39,967	10,933
Amount	1,719,433	390,565	349,908	306,894	446,105	225,962
Contributions: Number	171,876	43,963	39,439	32,663	43,115	12,696
Amount	463,738	55,243	61,746	60,327	115,378	171,045
Taxable income: Number	406,548	230,738	70,827	43,615	47,991	13,377
Amount	19,303,660	3,319,032	2,857,956	2,599,692	4,665,133	5,861,847
Total tax credits [7]: Number	161,125	75,945	30,897	23,638	24,085	6,560
Amount	171,785	54,432	43,397	36,613	25,026	12,316
Child tax credit: Number	86,082	37,191	20,648	15,548	12,692	3
Amount	106,425	31,127	32,079	25,843	17,375	1
Child and dependent care credit: Number	20,352	6,870	3,915	3,688	5,004	875
Amount	10,577	3,468	1,975	1,959	2,684	490
Earned income credit [8]: Number	69,434	69,434	0	0	0	0
Amount	126,043	126,043	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	60,562	60,562	0	0	0	0
Amount	111,725	111,726	0	0	0	0
Alternative minimum tax: Number	15,705	86	220	354	4,568	10,477
Amount	80,674	298	242	607	8,296	71,231
Income tax [10]: Number	369,990	197,217	68,138	43,304	47,954	13,377
Amount	3,466,035	363,759	375,837	355,660	818,705	1,552,075
Total tax liability [11]: Number	390,862	217,081	69,004	43,407	47,990	13,380
Amount	3,640,847	419,045	399,637	376,122	858,488	1,587,553
Tax due at time of filing [12]: Number	85,484	39,132	14,213	9,327	15,823	6,989
Amount	361,008	39,794	27,901	24,014	73,466	195,833
Overpayments [13]: Number	415,412	293,507	55,296	33,045	29,746	3,818
Amount	919,315	471,365	159,828	117,623	127,170	43,329

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
SOUTH CAROLINA						
Number of returns	1,948,517	1,399,423	239,562	138,449	131,212	39,871
Number of joint returns	731,736	298,940	162,356	118,302	117,152	34,986
Number with paid preparer's signature	1,259,076	900,721	153,744	86,474	84,342	33,795
Number of exemptions	3,906,882	2,465,518	587,068	377,184	365,715	111,397
Adjusted gross income (AGI) [3]	91,820,608	27,433,487	14,720,733	11,934,640	17,208,264	20,523,482
Salaries and wages in AGI [4]: Number	1,675,440	1,190,594	212,216	123,735	116,195	32,700
Amount	63,229,263	23,528,448	11,308,505	8,985,523	11,898,911	7,507,875
Taxable interest: Number	706,733	333,782	131,962	95,195	107,804	37,990
Amount	1,925,994	481,724	236,001	191,177	342,772	674,319
Ordinary dividends: Number	355,469	143,812	62,437	50,275	68,393	30,552
Amount	1,914,785	263,354	176,899	170,931	401,675	901,928
Business or profession net income (less loss):						
Number	287,742	177,627	42,669	26,891	28,662	11,893
Amount	2,137,706	63,106	344,951	281,816	599,589	848,246
Number of farm returns	22,085	9,804	4,050	3,040	3,388	1,803
Net capital gain (less loss) in AGI: Number	296,842	116,259	49,304	40,182	59,983	31,114
Amount	7,283,966	306,923	215,647	258,319	904,911	5,598,167
Taxable Individual Retirement Arrangements distributions: Number	135,289	67,423	25,878	17,866	18,531	5,591
Amount	1,849,188	474,142	312,395	305,262	488,183	269,208
Pensions and annuities in AGI: Number	376,124	204,261	70,522	45,521	45,018	10,802
Amount	6,866,008	2,340,369	1,413,594	1,142,393	1,508,324	461,326
Unemployment compensation: Number	103,381	82,902	11,671	5,141	3,306	361
Amount	303,713	230,133	39,515	18,384	13,900	1,781
Social Security benefits in AGI: Number	199,549	90,367	47,126	27,054	25,965	9,037
Amount	2,103,137	416,315	601,696	446,726	463,882	174,517
Self-employment retirement plans: Number	10,499	1,587	1,050	1,184	3,175	3,503
Amount	170,820	8,595	8,051	10,857	44,719	98,600
Total itemized deductions [6]: Number	648,199	234,110	145,380	110,004	120,257	38,448
Amount	14,242,468	3,521,860	2,500,469	2,200,535	3,248,702	2,770,902
State and local income taxes: Number	567,422	177,540	133,242	104,066	115,688	36,886
Amount	3,045,471	292,366	419,847	470,110	825,256	1,037,892
State and local general sales taxes: Number	68,451	45,831	11,099	5,603	4,384	1,534
Amount	83,189	37,240	15,708	9,586	10,190	10,465
Real estate taxes: Number	578,894	191,223	132,583	103,650	114,805	36,633
Amount	1,109,024	243,252	183,629	172,488	284,955	224,701
Taxes paid: Number	648,336	233,613	145,671	110,176	120,384	38,492
Amount	4,557,922	651,253	682,673	711,070	1,199,061	1,313,865
Mortgage Interest paid: Number	550,940	183,275	127,878	99,732	107,595	32,460
Amount	5,152,084	1,298,377	981,257	853,230	1,194,266	824,954
Contributions: Number	562,328	184,279	127,405	100,359	113,311	36,974
Amount	2,639,355	471,091	422,583	388,233	598,272	759,176
Taxable income: Number	1,465,869	918,456	238,397	138,183	131,018	39,815
Amount	59,712,904	11,931,471	9,406,637	8,205,119	12,649,478	17,520,199
Total tax credits [7]: Number	617,809	362,039	107,879	71,695	59,314	16,882
Amount	649,331	268,362	168,090	117,962	65,564	29,355
Child tax credit: Number	388,544	223,415	81,473	51,096	32,550	10
Amount	437,377	178,327	128,766	85,632	44,642	10
Child and dependent care credit: Number	103,910	48,001	22,784	16,906	14,032	2,187
Amount	55,346	25,486	12,010	9,217	7,404	1,229
Earned income credit [8]: Number	445,367	445,367	0	0	0	0
Amount	902,748	902,748	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	403,701	403,701	0	0	0	0
Amount	825,393	825,392	0	0	0	0
Alternative minimum tax: Number	37,513	434	897	1,062	7,913	27,207
Amount	187,277	2,095	1,197	1,942	15,867	166,176
Income tax [10]: Number	1,258,643	721,246	229,610	137,136	130,822	39,829
Amount	9,923,162	1,186,384	1,150,189	1,083,029	2,174,488	4,329,072
Total tax liability [11]: Number	1,361,870	820,665	232,754	137,626	130,980	39,845
Amount	10,538,238	1,408,576	1,241,379	1,153,438	2,292,150	4,442,695
Tax due at time of filing [12]: Number	368,493	178,693	67,233	41,928	57,722	22,917
Amount	1,570,796	181,154	136,848	114,652	299,232	838,910
Overpayments [13]: Number	1,527,365	1,190,601	167,143	92,473	66,738	10,410
Amount	3,331,821	2,212,596	416,968	281,675	274,386	146,194

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
SOUTH DAKOTA						
Number of returns	377,808	267,757	54,573	27,554	20,727	7,197
Number of joint returns	160,280	66,735	43,810	24,811	18,576	6,348
Number with paid preparer's signature	229,573	155,010	34,901	18,060	15,191	6,411
Number of exemptions	721,654	414,033	147,260	79,782	59,899	20,680
Adjusted gross income (AGI) [3]	17,667,783	5,016,414	3,355,501	2,361,386	2,704,776	4,229,704
Salaries and wages in AGI [4]: Number	317,788	221,507	48,326	24,422	17,698	5,835
Amount	11,236,970	4,256,121	2,527,961	1,692,541	1,624,703	1,135,645
Taxable interest: Number	172,909	94,715	33,246	20,457	17,600	6,891
Amount	553,918	157,345	73,394	57,077	85,098	181,004
Ordinary dividends: Number	91,626	43,702	17,716	12,227	12,321	5,660
Amount	361,864	64,681	36,741	32,348	64,932	163,163
Business or profession net income (less loss):						
Number	61,238	35,817	11,972	6,124	5,151	2,174
Amount	602,494	175,620	109,749	74,680	114,352	128,092
Number of farm returns	32,255	20,399	5,431	2,969	2,465	991
Net capital gain (less loss) in AGI: Number	89,414	44,333	16,182	11,238	11,793	5,868
Amount	1,776,467	140,003	92,309	94,937	218,769	1,230,449
Taxable Individual Retirement Arrangements distributions: Number	31,902	18,405	6,106	3,493	3,020	878
Amount	296,171	97,504	57,756	46,252	61,559	33,101
Pensions and annuities in AGI: Number	63,482	36,604	12,585	7,198	5,579	1,516
Amount	1,007,101	381,775	235,690	168,233	164,974	56,428
Unemployment compensation: Number	9,634	7,292	1,600	498	219	25
Amount	24,429	17,699	4,322	1,602	736	72
Social Security benefits in AGI: Number	41,309	20,316	9,828	5,183	4,395	1,587
Amount	397,002	89,472	121,705	81,232	74,750	29,844
Self-employment retirement plans: Number	2,881	463	381	442	880	715
Amount	38,569	2,264	2,503	3,714	11,672	18,416
Total itemized deductions [6]: Number	75,077	26,807	17,108	12,888	13,014	5,260
Amount	1,529,477	468,780	269,122	224,179	284,819	282,576
State and local income taxes: Number	8,349	2,349	1,813	1,506	1,647	1,034
Amount	48,585	3,074	3,434	3,717	6,911	31,447
State and local general sales taxes: Number	59,532	20,437	13,666	10,515	10,751	4,163
Amount	82,015	15,835	16,576	15,903	20,637	13,065
Real estate taxes: Number	65,312	20,637	15,293	12,085	12,299	4,998
Amount	179,161	39,174	34,162	31,653	41,752	32,422
Taxes paid: Number	74,208	25,963	17,048	12,890	13,028	5,279
Amount	315,834	59,737	55,391	52,199	70,599	77,908
Mortgage Interest paid: Number	59,980	18,079	14,591	11,530	11,473	4,307
Amount	538,007	116,680	113,418	99,225	117,108	91,577
Contributions: Number	60,589	18,046	13,809	11,404	12,251	5,079
Amount	285,287	36,656	36,514	36,122	61,410	114,587
Taxable income: Number	292,600	182,732	54,434	27,534	20,709	7,191
Amount	12,503,160	2,516,950	2,230,263	1,723,344	2,144,180	3,888,422
Total tax credits [7]: Number	126,677	66,580	29,306	16,168	10,882	3,741
Amount	164,977	49,148	51,150	29,698	14,983	19,999
Child tax credit: Number	68,522	31,666	20,842	10,540	5,469	5
Amount	93,343	28,654	36,436	19,685	8,565	4
Child and dependent care credit: Number	24,285	9,218	8,022	4,128	2,470	447
Amount	11,580	4,094	4,077	2,064	1,130	216
Earned income credit [8]: Number	57,436	57,436	0	0	0	0
Amount	100,913	100,913	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	49,656	49,656	0	0	0	0
Amount	90,373	90,373	0	0	0	0
Alternative minimum tax: Number	3,640	185	140	143	725	2,447
Amount	15,885	624	232	241	1,554	13,233
Income tax [10]: Number	259,798	152,684	51,917	27,335	20,669	7,193
Amount	2,140,096	253,829	251,547	218,832	366,003	1,049,883
Total tax liability [11]: Number	281,265	172,950	52,997	27,431	20,693	7,194
Amount	2,294,904	308,910	281,243	239,619	393,650	1,071,481
Tax due at time of filing [12]: Number	82,605	41,284	16,647	9,639	10,685	4,350
Amount	404,882	45,841	41,813	35,651	79,388	202,190
Overpayments [13]: Number	282,253	219,134	36,305	16,780	8,524	1,510
Amount	536,695	338,744	89,147	49,121	34,214	25,469

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
TENNESSEE						
Number of returns	2,742,268	1,958,542	356,951	190,640	176,723	59,412
Number of joint returns	1,107,676	487,082	250,680	162,079	155,916	51,919
Number with paid preparer's signature	1,609,655	1,144,430	208,128	106,519	103,482	47,096
Number of exemptions	5,487,469	3,422,148	877,999	517,295	497,704	172,323
Adjusted gross income (AGI) [3]	134,041,381	38,652,604	21,887,891	16,407,898	23,244,625	33,848,362
Salaries and wages in AGI [4]: Number	2,337,902	1,639,010	321,845	172,161	156,691	48,195
Amount	96,066,458	33,070,809	17,648,869	12,946,906	16,885,224	15,514,650
Taxable interest: Number	1,010,661	494,721	189,904	128,019	141,964	56,053
Amount	3,059,568	797,840	351,805	227,420	469,624	1,212,879
Ordinary dividends: Number	453,995	187,465	77,828	60,121	84,071	44,510
Amount	2,447,914	300,150	181,640	172,773	414,789	1,378,564
Business or profession net income (less loss):						
Number	471,174	297,637	67,434	40,106	45,063	20,934
Amount	6,739,800	1,610,183	717,315	599,703	1,411,392	2,401,207
Number of farm returns	79,194	43,142	14,884	8,895	8,194	4,079
Net capital gain (less loss) in AGI: Number	407,640	167,831	66,426	51,569	76,697	45,117
Amount	10,491,280	432,785	292,397	331,378	1,028,591	8,406,128
Taxable Individual Retirement Arrangements distributions: Number	174,300	93,179	32,534	20,772	21,192	6,623
Amount	2,147,375	620,497	382,176	330,440	522,804	291,459
Pensions and annuities in AGI: Number	465,238	270,389	84,317	50,204	47,630	12,698
Amount	7,746,803	2,988,022	1,595,800	1,180,252	1,475,105	507,625
Unemployment compensation: Number	135,129	102,268	19,694	7,795	4,738	634
Amount	391,601	290,063	58,693	24,048	16,215	2,582
Social Security benefits in AGI: Number	254,917	123,559	59,555	31,951	29,235	10,617
Amount	2,561,738	546,573	751,424	522,083	527,736	213,922
Self-employment retirement plans: Number	20,774	2,330	1,843	2,160	6,391	8,050
Amount	381,214	12,560	14,426	20,504	97,891	235,831
Total itemized deductions [6]: Number	720,533	261,485	158,576	114,123	135,539	50,810
Amount	14,726,238	3,786,119	2,618,371	2,150,794	3,229,063	2,941,892
State and local income taxes: Number	80,675	25,559	15,888	12,102	16,640	10,486
Amount	420,597	66,813	32,248	33,424	68,055	220,057
State and local general sales taxes: Number	549,887	185,182	123,151	91,357	110,808	39,389
Amount	1,253,079	265,256	237,569	216,494	334,576	199,185
Real estate taxes: Number	630,365	206,959	140,892	105,892	128,227	48,395
Amount	1,330,589	295,793	218,305	193,540	329,809	293,140
Taxes paid: Number	708,007	251,339	156,626	113,643	135,415	50,984
Amount	3,189,155	759,611	503,751	454,676	746,764	724,354
Mortgage Interest paid: Number	614,158	205,433	139,796	103,649	122,216	43,064
Amount	6,020,874	1,522,535	1,135,903	954,122	1,376,839	1,031,476
Contributions: Number	599,592	190,459	132,981	101,522	125,824	48,806
Amount	3,437,075	512,054	480,482	447,120	768,418	1,229,002
Taxable income: Number	2,074,505	1,292,429	355,799	190,373	176,541	59,363
Amount	92,177,389	17,362,022	14,478,952	11,781,210	17,970,972	30,584,233
Total tax credits [7]: Number	842,833	483,751	160,527	96,586	76,336	25,633
Amount	922,987	365,290	252,620	158,908	84,101	62,067
Child tax credit: Number	533,258	293,702	124,655	70,835	44,043	23
Amount	623,206	246,347	198,515	118,203	60,118	24
Child and dependent care credit: Number	125,590	53,875	30,369	20,380	17,714	3,252
Amount	64,063	27,546	14,934	10,623	9,276	1,682
Earned income credit [8]: Number	578,868	578,868	0	0	0	0
Amount	1,137,752	1,137,752	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	511,315	511,315	0	0	0	0
Amount	1,005,663	1,005,662	0	0	0	0
Alternative minimum tax: Number	27,127	538	975	1,098	5,602	18,914
Amount	139,500	21,158	1,826	2,183	12,028	102,305
Income tax [10]: Number	1,817,729	1,047,950	344,810	189,256	176,348	59,365
Amount	16,328,905	1,778,202	1,788,721	1,599,666	3,193,900	7,968,414
Total tax liability [11]: Number	1,988,304	1,213,698	348,875	189,808	176,542	59,381
Amount	17,563,855	2,174,990	1,951,387	1,731,236	3,445,293	8,260,946
Tax due at time of filing [12]: Number	466,454	233,832	80,182	49,435	70,964	32,041
Amount	2,196,795	256,504	184,610	158,271	407,673	1,189,736
Overpayments [13]: Number	2,201,420	1,681,753	269,496	135,875	96,646	17,650
Amount	5,034,367	3,183,578	734,023	450,726	403,260	262,780

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
TEXAS	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	10,090,061	7,024,839	1,220,977	728,725	826,899	288,621
Number of joint returns	3,960,160	1,669,986	751,716	576,173	712,357	249,928
Number with paid preparer's signature	5,694,267	4,024,866	652,645	371,612	434,225	210,919
Number of exemptions	21,478,851	13,240,909	3,034,649	1,990,834	2,370,760	841,699
Adjusted gross income (AGI) [3]	562,874,768	136,372,521	74,958,308	62,949,143	110,112,079	178,482,715
Salaries and wages in AGI [4]: Number	8,669,873	5,924,263	1,093,324	658,751	749,206	244,329
Amount	395,476,131	121,487,939	61,108,170	50,593,541	84,626,394	77,660,085
Taxable interest: Number	3,485,017	1,489,130	600,792	466,761	656,132	272,202
Amount	13,354,463	2,418,561	1,137,430	980,222	1,993,792	6,824,459
Ordinary dividends: Number	1,723,171	606,265	266,285	232,345	398,828	219,448
Amount	11,485,592	1,212,624	677,246	675,354	1,746,201	7,174,166
Business or profession net income (less loss):						
Number	1,914,912	1,216,561	235,589	160,664	207,061	95,037
Amount	23,241,321	6,232,785	2,140,178	1,923,370	4,833,768	8,111,220
Number of farm returns	244,087	108,313	43,221	32,196	38,902	21,455
Net capital gain (less loss) in AGI: Number	1,552,570	537,039	229,929	201,821	363,948	219,833
Amount	51,366,013	1,377,489	842,535	1,016,993	3,605,342	44,523,656
Taxable Individual Retirement Arrangements distributions: Number	592,933	273,431	112,212	80,440	96,371	30,479
Amount	8,694,169	1,968,582	1,409,371	1,378,266	2,534,234	1,403,717
Pensions and annuities in AGI: Number	1,464,071	752,485	268,275	181,329	205,934	56,048
Amount	26,950,971	8,714,525	5,400,772	4,365,224	6,210,892	2,259,556
Unemployment compensation: Number	302,458	217,311	41,984	21,642	18,632	2,889
Amount	1,027,446	713,877	147,320	79,644	73,241	13,363
Social Security benefits in AGI: Number	775,087	326,817	180,316	109,063	114,278	44,613
Amount	8,240,763	1,494,625	2,222,910	1,697,341	1,964,358	861,527
Self-employment retirement plans: Number	71,560	8,760	6,574	7,309	22,172	26,745
Amount	1,308,101	49,484	53,690	73,465	339,342	792,120
Total itemized deductions [6]: Number	2,643,204	809,587	525,937	428,527	633,302	245,851
Amount	59,774,769	13,188,421	9,110,710	8,133,911	14,877,447	14,464,280
State and local income taxes: Number	224,894	64,430	43,581	34,994	53,934	27,955
Amount	1,120,243	91,954	77,936	77,894	184,290	688,170
State and local general sales taxes: Number	1,969,959	523,000	384,320	333,321	520,218	209,100
Amount	3,761,115	541,534	567,719	588,666	1,203,815	859,382
Real estate taxes: Number	2,279,670	598,163	453,171	393,979	600,447	233,910
Amount	11,072,714	1,931,602	1,578,813	1,607,635	3,265,706	2,688,958
Taxes paid: Number	2,578,759	756,057	516,052	426,591	633,221	246,838
Amount	19,238,736	2,708,760	2,316,436	2,343,873	4,749,639	7,120,029
Mortgage Interest paid: Number	2,194,938	579,327	443,184	383,583	575,898	212,946
Amount	21,654,446	4,716,291	3,182,759	3,072,748	5,654,432	5,028,217
Contributions: Number	2,137,695	554,905	419,850	363,583	568,631	230,726
Amount	12,273,603	1,366,198	1,328,236	1,338,436	2,770,567	5,470,166
Taxable income: Number	7,562,145	4,504,165	1,216,007	727,543	826,084	288,346
Amount	403,308,275	59,740,015	49,767,746	45,359,772	85,629,462	162,811,280
Total tax credits [7]: Number	3,379,213	1,924,941	568,299	381,165	374,531	130,277
Amount	4,140,891	1,523,731	949,156	663,948	454,499	549,557
Child tax credit: Number	2,185,477	1,244,280	444,070	283,040	213,995	92
Amount	2,551,808	1,023,447	744,197	488,896	295,200	70
Child and dependent care credit: Number	481,603	196,746	98,572	79,174	88,929	18,182
Amount	267,411	108,801	53,958	45,101	49,695	9,854
Earned income credit [8]: Number	2,308,824	2,308,824	0	0	0	0
Amount	4,996,074	4,996,074	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	2,072,055	2,072,055	0	0	0	0
Amount	4,376,696	4,376,696	0	0	0	0
Alternative minimum tax: Number	180,948	2,582	6,903	8,681	46,086	116,696
Amount	719,579	15,450	8,847	14,258	94,236	586,788
Income tax [10]: Number	6,403,272	3,404,034	1,163,745	722,333	824,874	288,286
Amount	76,430,684	5,848,746	6,274,245	6,301,139	15,511,705	42,494,847
Total tax liability [11]: Number	7,150,604	4,132,199	1,179,736	724,596	825,660	288,413
Amount	80,687,346	7,376,289	6,779,650	6,727,628	16,354,318	43,449,462
Tax due at time of filing [12]: Number	1,781,927	831,447	280,520	190,093	324,715	155,152
Amount	9,339,109	908,094	643,447	591,438	1,731,667	5,464,463
Overpayments [13]: Number	7,993,553	6,017,150	913,143	517,054	460,914	85,292
Amount	20,288,768	12,636,245	2,630,204	1,767,269	1,922,467	1,332,584

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
UTAH	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	1,075,222	713,056	163,394	90,695	82,606	25,471
Number of joint returns	507,399	204,045	125,051	80,275	75,271	22,757
Number with paid preparer's signature	569,782	362,511	88,488	48,830	49,193	20,760
Number of exemptions	2,471,732	1,316,021	500,718	295,930	273,804	85,259
Adjusted gross income (AGI) [3]	57,463,484	14,184,182	10,039,620	7,804,040	10,777,802	14,657,840
Salaries and wages in AGI [4]: Number	944,860	616,182	148,639	83,127	75,256	21,656
Amount	39,908,173	12,739,623	8,221,266	6,232,572	7,781,579	4,933,131
Taxable interest: Number	520,161	247,588	106,101	69,950	72,035	24,487
Amount	1,343,842	273,541	134,607	114,240	223,387	598,067
Ordinary dividends: Number	186,668	75,116	33,807	26,310	34,723	16,712
Amount	914,629	115,408	63,484	61,749	140,727	533,261
Business or profession net income (less loss):						
Number	174,025	94,155	33,048	19,689	19,853	7,280
Amount	1,399,467	341,635	192,975	148,023	309,204	407,630
Number of farm returns	14,314	6,556	3,035	1,978	1,804	941
Net capital gain (less loss) in AGI: Number	179,189	68,867	31,227	24,875	35,463	18,757
Amount	5,108,737	234,102	138,119	177,992	588,019	3,970,507
Taxable Individual Retirement Arrangements distributions: Number	62,090	30,997	12,546	8,325	7,920	2,302
Amount	734,734	199,840	133,366	124,207	185,821	91,500
Pensions and annuities in AGI: Number	161,157	84,400	32,714	20,314	19,255	4,474
Amount	3,120,582	1,096,021	708,363	525,655	616,222	174,323
Unemployment compensation: Number	29,812	20,821	5,363	2,260	1,225	143
Amount	87,783	59,285	16,407	7,187	4,256	649
Social Security benefits in AGI: Number	89,829	40,391	21,911	12,441	11,194	3,892
Amount	926,497	181,804	271,825	200,011	198,561	74,294
Self-employment retirement plans: Number	4,892	708	494	541	1,552	1,597
Amount	83,616	4,096	3,747	5,177	23,123	47,473
Total itemized deductions [6]: Number	441,069	143,979	116,950	78,143	77,518	24,479
Amount	10,651,180	2,319,155	2,152,665	1,725,776	2,291,328	2,162,256
State and local income taxes: Number	387,989	107,233	108,744	74,630	74,275	23,107
Amount	2,051,661	186,966	324,742	321,611	509,504	708,837
State and local general sales taxes: Number	47,611	31,991	7,804	3,374	3,113	1,329
Amount	105,066	61,337	15,030	8,416	11,871	8,411
Real estate taxes: Number	395,903	119,150	106,374	73,175	73,868	23,336
Amount	703,217	171,346	147,107	118,173	159,201	107,390
Taxes paid: Number	441,443	144,033	117,136	78,227	77,555	24,492
Amount	2,905,204	422,811	499,605	458,521	693,020	831,247
Mortgage Interest paid: Number	380,228	116,751	104,665	70,210	68,662	19,940
Amount	3,759,185	813,781	949,968	699,117	822,309	474,011
Contributions: Number	387,123	113,735	104,310	72,097	73,424	23,557
Amount	2,901,485	370,910	487,832	440,361	648,785	953,595
Taxable income: Number	844,239	483,700	162,198	90,451	82,473	25,417
Amount	36,937,162	6,180,199	5,809,155	4,982,019	7,543,813	12,421,978
Total tax credits [7]: Number	398,323	200,050	94,247	54,194	41,146	8,686
Amount	525,327	155,255	166,967	110,422	63,108	29,576
Child tax credit: Number	264,413	116,342	76,911	42,743	28,321	96
Amount	381,953	100,506	139,164	90,530	51,672	80
Child and dependent care credit: Number	36,652	13,507	10,765	6,502	5,078	800
Amount	17,360	6,321	4,986	3,158	2,484	410
Earned income credit [8]: Number	145,562	145,562	0	0	0	0
Amount	266,931	266,932	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	129,141	129,141	0	0	0	0
Amount	237,409	237,409	0	0	0	0
Alternative minimum tax: Number	21,922	465	491	604	5,000	15,362
Amount	114,053	1,893	1,307	1,169	10,867	98,817
Income tax [10]: Number	712,175	376,981	140,663	87,138	81,967	25,426
Amount	6,254,166	594,848	627,520	604,676	1,249,996	3,177,126
Total tax liability [11]: Number	769,892	426,993	146,975	88,292	82,196	25,436
Amount	6,560,580	699,255	676,211	641,910	1,310,525	3,232,679
Tax due at time of filing [12]: Number	212,400	98,161	38,897	25,188	35,234	14,920
Amount	1,051,189	92,148	74,239	66,606	191,490	626,704
Overpayments [13]: Number	833,096	596,917	121,902	63,514	43,893	6,870
Amount	1,796,303	961,758	326,291	197,863	188,003	122,387

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
VERMONT						
Number of returns	319,131	218,928	44,754	25,696	22,850	6,903
Number of joint returns	126,551	47,681	31,242	21,929	19,836	5,863
Number with paid preparer's signature	167,585	107,978	25,747	14,463	13,733	5,664
Number of exemptions	571,824	310,793	107,889	70,014	64,018	19,110
Adjusted gross income (AGI) [3]	15,779,630	4,231,025	2,753,698	2,212,796	2,999,976	3,582,136
Salaries and wages in AGI [4]: Number	262,578	173,290	40,320	23,296	20,069	5,603
Amount	10,475,720	3,458,206	2,138,138	1,698,020	2,011,000	1,170,357
Taxable interest: Number	164,551	86,390	30,468	20,536	20,474	6,683
Amount	395,995	112,313	50,487	40,254	71,346	121,596
Ordinary dividends: Number	88,544	41,044	15,603	11,822	14,302	5,773
Amount	555,087	81,695	51,012	46,761	109,048	266,574
Business or profession net income (less loss):						
Number	59,779	35,559	10,130	5,965	5,952	2,173
Amount	736,662	242,166	121,357	92,479	149,969	130,690
Number of farm returns	4,230	2,595	632	392	404	207
Net capital gain (less loss) in AGI: Number	70,970	31,722	11,836	9,201	12,518	5,693
Amount	1,656,425	88,157	68,229	73,363	231,754	1,194,923
Taxable Individual Retirement Arrangements distributions: Number	26,009	14,751	4,499	2,912	2,940	907
Amount	272,544	81,075	46,018	41,010	66,264	38,176
Pensions and annuities in AGI: Number	52,901	30,596	9,432	5,810	5,534	1,529
Amount	839,886	305,474	171,663	131,012	168,418	63,320
Unemployment compensation: Number	22,732	17,075	3,604	1,326	647	80
Amount	78,280	55,360	14,063	5,484	2,887	488
Social Security benefits in AGI: Number	31,807	14,534	7,521	4,163	4,059	1,530
Amount	324,045	65,527	94,093	65,312	70,601	28,511
Self-employment retirement plans: Number	3,869	808	633	593	1,176	659
Amount	49,885	5,094	4,939	5,138	18,019	16,696
Total itemized deductions [6]: Number	99,570	32,056	22,154	18,000	20,688	6,672
Amount	2,079,848	438,167	350,286	324,751	500,418	466,226
State and local income taxes: Number	90,625	25,156	21,118	17,550	20,288	6,513
Amount	472,826	34,401	48,146	58,200	124,990	207,090
State and local general sales taxes: Number	7,678	5,661	1,026	464	379	148
Amount	6,968	3,183	1,398	925	993	469
Real estate taxes: Number	93,295	28,664	21,017	17,282	19,873	6,459
Amount	404,314	86,921	71,957	71,971	108,463	65,000
Taxes paid: Number	99,831	32,121	22,258	18,073	20,706	6,673
Amount	894,144	126,071	123,441	132,709	236,908	275,015
Mortgage Interest paid: Number	84,547	25,719	19,682	16,201	17,770	5,175
Amount	724,998	176,450	155,723	132,830	167,168	92,828
Contributions: Number	76,567	19,839	16,751	14,913	18,742	6,322
Amount	252,823	25,608	26,862	28,123	57,184	115,045
Taxable income: Number	249,096	149,164	44,574	25,642	22,818	6,898
Amount	10,919,263	2,156,802	1,838,347	1,581,679	2,268,373	3,074,063
Total tax credits [7]: Number	99,830	47,150	21,774	14,751	12,225	3,930
Amount	114,005	33,985	33,146	24,019	12,663	10,195
Child tax credit: Number	51,706	22,164	14,501	9,359	5,682	**
Amount	67,094	20,320	23,353	15,619	7,802	**
Child and dependent care credit: Number	14,047	4,430	3,867	2,881	2,421	448
Amount	6,982	2,042	1,988	1,544	1,186	221
Earned income credit [8]: Number	39,236	39,236	0	0	0	0
Amount	61,255	61,255	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	31,680	31,680	0	0	0	0
Amount	51,042	51,041	0	0	0	0
Alternative minimum tax: Number	7,933	79	94	157	2,041	5,562
Amount	46,097	156	134	268	4,221	41,317
Income tax [10]: Number	228,648	130,379	43,122	25,461	22,786	6,900
Amount	1,761,930	232,353	223,283	206,875	387,585	711,833
Total tax liability [11]: Number	245,410	146,463	43,696	25,541	22,809	6,901
Amount	1,895,178	282,681	246,373	224,465	413,467	728,191
Tax due at time of filing [12]: Number	62,923	31,976	11,325	6,714	9,203	3,705
Amount	235,977	31,985	22,062	18,590	47,953	115,388
Overpayments [13]: Number	242,963	179,555	31,969	17,819	11,861	1,759
Amount	451,381	244,261	78,781	55,132	48,345	24,864

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
VIRGINIA						
Number of returns	3,618,883	2,215,540	513,444	329,371	423,473	137,055
Number of joint returns	1,449,904	439,692	290,592	242,256	356,016	121,348
Number with paid preparer's signature	1,827,599	1,113,860	260,955	159,078	202,500	91,206
Number of exemptions	7,034,339	3,456,332	1,155,119	840,956	1,182,237	399,695
Adjusted gross income (AGI) [3]	230,254,681	46,004,290	31,631,099	28,497,629	57,108,850	67,012,812
Salaries and wages in AGI [4]: Number	3,136,556	1,872,730	458,386	297,250	387,363	120,827
Amount	163,227,443	39,557,149	25,339,093	22,539,686	43,867,962	31,923,553
Taxable interest: Number	1,697,007	659,803	304,792	240,134	361,350	130,928
Amount	5,004,998	949,096	527,073	470,887	967,468	2,090,474
Ordinary dividends: Number	918,028	293,769	146,283	130,959	237,400	109,617
Amount	5,406,813	535,879	398,021	423,266	1,182,673	2,866,974
Business or profession net income (less loss):						
Number	510,615	263,766	76,105	55,238	81,957	33,549
Amount	6,992,769	1,545,781	709,510	630,402	1,721,563	2,385,514
Number of farm returns	41,804	20,427	7,575	4,889	5,746	3,167
Net capital gain (less loss) in AGI: Number	752,441	230,125	112,204	103,481	201,421	105,210
Amount	17,918,078	556,169	498,953	519,111	1,977,912	14,365,935
Taxable Individual Retirement Arrangements distributions: Number	236,654	100,572	45,025	33,736	43,263	14,058
Amount	2,877,029	610,576	451,951	449,705	847,695	517,102
Pensions and annuities in AGI: Number	681,865	302,997	123,214	89,753	126,105	39,796
Amount	15,555,042	3,745,631	2,754,678	2,524,729	4,593,016	1,936,988
Unemployment compensation: Number	101,982	72,012	15,370	7,435	6,235	930
Amount	306,098	206,847	48,439	24,428	22,743	3,641
Social Security benefits in AGI: Number	358,934	142,545	83,317	52,784	59,753	20,535
Amount	3,865,351	657,968	1,011,614	803,043	1,001,994	390,733
Self-employment retirement plans: Number	35,762	3,441	2,679	3,268	11,892	14,482
Amount	695,881	21,273	22,048	31,131	165,641	455,789
Total itemized deductions [6]: Number	1,510,500	427,005	305,060	255,310	388,920	134,205
Amount	38,574,744	6,350,783	5,846,125	5,673,246	11,672,514	9,032,078
State and local income taxes: Number	1,384,933	344,233	285,667	244,471	379,377	131,185
Amount	8,165,643	550,110	792,517	980,622	2,478,205	3,364,189
State and local general sales taxes: Number	95,700	59,625	15,749	9,062	8,378	2,886
Amount	115,107	33,431	17,590	14,028	21,414	28,646
Real estate taxes: Number	1,339,352	325,507	273,893	238,802	371,110	130,040
Amount	4,344,308	658,134	629,299	664,268	1,460,614	931,995
Taxes paid: Number	1,508,415	424,296	305,249	255,504	389,098	134,268
Amount	15,059,488	1,335,449	1,528,417	1,747,636	6,002,685	4,445,299
Mortgage Interest paid: Number	1,286,127	318,629	266,331	230,424	352,078	118,665
Amount	17,315,143	3,376,000	2,834,423	2,733,970	5,309,357	3,061,395
Contributions: Number	1,270,132	307,030	253,774	224,052	357,237	128,039
Amount	5,359,964	647,702	665,999	671,149	1,395,422	1,979,693
Taxable income: Number	2,941,706	1,545,245	508,396	328,283	422,851	136,931
Amount	160,317,124	21,884,190	20,338,944	19,384,900	41,390,015	57,319,076
Total tax credits [7]: Number	1,204,649	545,063	219,705	168,556	203,339	67,986
Amount	1,310,720	406,595	315,560	262,154	201,538	124,874
Child tax credit: Number	665,266	293,784	156,289	114,309	100,830	54
Amount	815,651	249,183	239,855	190,360	136,203	50
Child and dependent care credit: Number	189,271	63,991	37,218	30,592	45,332	12,138
Amount	102,112	34,488	19,689	16,856	24,667	6,412
Earned income credit [8]: Number	510,060	510,060	0	0	0	0
Amount	944,149	944,149	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	448,708	448,708	0	0	0	0
Amount	846,664	846,664	0	0	0	0
Alternative minimum tax: Number	127,929	725	1,653	2,514	28,084	94,953
Amount	565,164	3,133	2,700	4,159	50,528	504,644
Income tax [10]: Number	2,660,983	1,291,985	485,700	324,240	422,092	136,966
Amount	29,554,772	2,328,750	2,657,275	2,710,645	7,346,670	14,511,433
Total tax liability [11]: Number	2,816,232	1,437,173	493,578	325,885	422,590	137,006
Amount	30,936,456	2,695,727	2,821,934	2,850,529	7,657,578	14,910,686
Tax due at time of filing [12]: Number	729,413	303,001	119,840	81,127	152,739	72,706
Amount	3,294,729	295,943	227,048	201,656	643,731	1,926,351
Overpayments [13]: Number	2,782,471	1,859,616	383,726	239,929	253,612	45,588
Amount	6,770,472	3,249,875	1,062,621	823,578	1,100,612	533,787

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
WASHINGTON						
Number of returns	3,017,975	1,864,634	455,558	288,930	313,844	95,009
Number of joint returns	1,252,474	409,884	270,195	223,256	268,101	81,038
Number with paid preparer's signature	1,440,965	839,801	224,421	141,437	164,296	71,010
Number of exemptions	5,934,211	2,990,182	1,058,486	750,447	868,088	267,008
Adjusted gross income (AGI) [3]	186,216,128	38,399,473	28,076,499	24,970,598	41,538,540	53,231,019
Salaries and wages in AGI [4]: Number	2,538,363	1,525,799	398,318	256,323	280,304	77,619
Amount	124,815,107	32,652,984	22,005,884	19,437,949	30,737,261	19,981,029
Taxable interest: Number	1,475,070	626,928	276,426	212,518	267,856	91,342
Amount	5,398,704	1,421,627	526,229	450,480	846,278	2,154,091
Ordinary dividends: Number	794,034	283,676	135,549	118,845	180,484	75,480
Amount	5,184,924	678,276	370,526	367,315	859,871	2,908,936
Business or profession net income (less loss):						
Number	430,094	220,215	72,565	50,460	62,583	24,271
Amount	6,646,629	1,367,170	847,337	732,464	1,664,810	2,034,847
Number of farm returns	27,255	12,432	4,914	3,643	4,206	2,060
Net capital gain (less loss) in AGI: Number	689,802	242,347	112,163	99,328	159,564	76,400
Amount	19,527,418	714,487	482,069	613,373	2,242,249	15,475,240
Taxable Individual Retirement Arrangements distributions: Number	224,607	104,533	44,230	30,968	34,408	10,468
Amount	3,096,959	700,607	522,344	512,805	868,947	492,257
Pensions and annuities in AGI: Number	521,737	259,584	101,042	69,161	73,178	18,772
Amount	10,475,640	3,384,337	2,198,653	1,787,317	2,343,034	762,297
Unemployment compensation: Number	177,881	113,921	33,178	16,795	12,429	1,558
Amount	646,422	381,088	129,498	69,261	58,133	8,443
Social Security benefits in AGI: Number	325,428	136,661	77,899	47,661	46,235	16,972
Amount	3,541,745	654,793	998,385	768,409	802,918	317,240
Self-employment retirement plans: Number	29,610	4,306	3,426	3,618	9,525	8,735
Amount	475,922	25,397	27,578	34,786	142,164	245,995
Total itemized deductions [6]: Number	1,138,192	333,752	256,882	204,306	259,864	83,388
Amount	26,379,345	5,749,850	4,697,446	4,264,659	6,777,758	4,889,631
State and local income taxes: Number	131,979	34,810	31,014	24,431	29,855	11,869
Amount	644,790	53,945	72,549	74,639	138,682	304,974
State and local general sales taxes: Number	888,095	243,987	197,371	162,098	214,890	69,749
Amount	2,068,995	295,102	348,630	360,580	649,798	414,887
Real estate taxes: Number	1,049,820	286,208	237,041	193,886	251,305	81,380
Amount	3,559,336	700,015	627,344	591,219	1,002,795	637,965
Taxes paid: Number	1,129,193	326,764	255,200	203,740	259,774	83,715
Amount	6,475,899	1,092,930	1,086,618	1,061,885	1,843,072	1,391,393
Mortgage Interest paid: Number	1,012,409	273,200	232,806	190,065	242,306	74,032
Amount	13,199,686	2,739,405	2,540,655	2,314,274	3,541,520	2,063,832
Contributions: Number	920,128	226,201	204,985	174,529	235,671	78,742
Amount	3,784,497	402,334	451,121	465,875	870,139	1,595,028
Taxable income: Number	2,461,607	1,312,470	452,522	288,275	313,431	94,909
Amount	133,854,215	19,029,554	18,197,012	17,447,669	31,404,242	47,775,739
Total tax credits [7]: Number	961,375	432,571	196,243	144,451	142,973	45,137
Amount	1,146,728	322,297	290,517	228,361	157,699	147,856
Child tax credit: Number	560,397	242,969	142,168	99,458	75,760	42
Amount	718,445	215,313	229,806	169,587	103,692	48
Child and dependent care credit: Number	116,143	38,098	24,999	20,914	26,177	5,955
Amount	59,288	18,488	12,531	11,204	13,889	3,174
Earned income credit [8]: Number	367,281	367,281	0	0	0	0
Amount	636,011	636,011	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	316,230	316,230	0	0	0	0
Amount	562,785	562,785	0	0	0	0
Alternative minimum tax: Number	54,697	816	1,131	1,931	12,104	38,715
Amount	259,519	4,611	1,868	4,232	27,032	221,777
Income tax [10]: Number	2,240,348	1,115,442	431,884	285,301	312,825	94,896
Amount	24,113,543	2,058,361	2,353,005	2,432,393	5,536,307	11,733,476
Total tax liability [11]: Number	2,357,071	1,224,069	438,442	286,434	313,201	94,925
Amount	25,322,372	2,397,750	2,528,131	2,579,688	5,817,847	11,998,957
Tax due at time of filing [12]: Number	616,568	263,201	108,855	74,675	119,171	50,666
Amount	3,115,810	270,402	226,654	211,210	606,069	1,801,475
Overpayments [13]: Number	2,280,710	1,537,826	334,142	204,546	177,301	26,895
Amount	5,203,281	2,479,008	916,222	680,437	745,909	381,706

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
WEST VIRGINIA						
Number of returns	770,261	554,055	109,663	55,693	41,212	9,638
Number of joint returns	353,777	176,897	82,951	48,691	36,863	8,375
Number with paid preparer's signature	405,116	280,724	61,193	31,034	24,184	7,981
Number of exemptions	1,508,585	940,755	274,663	151,580	114,449	27,138
Adjusted gross income (AGI) [3]	31,973,340	10,816,287	6,727,088	4,780,427	5,298,175	4,351,364
Salaries and wages in AGI [4]: Number	645,871	449,758	99,666	51,150	37,285	8,012
Amount	23,495,653	8,630,802	5,451,778	3,846,808	3,875,005	1,691,260
Taxable interest: Number	304,464	165,657	59,173	37,435	33,106	9,093
Amount	706,691	264,204	110,402	76,129	108,956	147,001
Ordinary dividends: Number	129,585	62,064	23,977	17,156	19,128	7,260
Amount	517,761	102,053	59,857	52,963	106,376	196,512
Business or profession net income (less loss):						
Number	96,272	58,910	15,643	9,112	8,920	3,687
Amount	1,167,456	288,999	135,397	110,837	248,515	383,708
Number of farm returns	14,451	8,290	2,883	1,585	1,217	476
Net capital gain (less loss) in AGI: Number	96,279	43,970	17,216	12,641	15,586	6,866
Amount	1,183,402	95,280	68,614	76,364	202,272	740,872
Taxable Individual Retirement Arrangements distributions: Number	52,982	31,618	9,615	5,711	4,875	1,163
Amount	538,994	189,045	107,599	87,472	110,712	44,166
Pensions and annuities in AGI: Number	164,255	106,746	27,637	15,403	12,181	2,288
Amount	2,555,913	1,246,677	517,047	345,579	362,843	83,767
Unemployment compensation: Number	47,985	34,079	8,728	3,486	1,619	73
Amount	143,598	94,324	28,965	12,775	7,182	353
Social Security benefits in AGI: Number	81,713	44,677	19,212	9,094	6,763	1,967
Amount	736,999	188,424	242,434	145,557	120,963	39,619
Self-employment retirement plans: Number	4,012	464	381	420	1,233	1,514
Amount	73,873	2,661	2,790	3,875	18,241	46,306
Total itemized deductions [6]: Number	143,819	40,486	33,384	28,581	32,174	9,194
Amount	2,807,210	561,272	526,172	504,070	714,952	500,745
State and local income taxes: Number	132,051	31,690	31,966	27,910	31,524	8,961
Amount	749,009	54,801	92,898	121,375	226,155	253,777
State and local general sales taxes: Number	10,443	7,480	1,390	696	644	233
Amount	20,167	6,869	2,876	1,938	2,900	5,583
Real estate taxes: Number	124,740	30,932	29,108	26,241	29,959	8,500
Amount	152,472	27,470	27,367	28,068	43,148	26,419
Taxes paid: Number	143,984	40,376	33,517	28,669	32,217	9,205
Amount	966,182	96,750	131,677	160,701	285,495	291,557
Mortgage Interest paid: Number	119,126	29,834	28,701	25,574	27,981	7,036
Amount	987,381	205,293	210,518	199,344	253,742	118,483
Contributions: Number	110,493	25,563	25,051	23,188	28,159	8,532
Amount	433,776	58,673	68,236	73,060	116,321	117,486
Taxable income: Number	574,273	358,347	109,476	55,644	41,182	9,624
Amount	20,791,570	4,823,030	4,554,054	3,500,864	4,115,739	3,797,884
Total tax credits [7]: Number	213,236	115,421	49,170	27,567	17,250	3,828
Amount	228,116	84,708	75,851	43,348	18,810	5,400
Child tax credit: Number	137,216	68,370	38,434	20,228	10,181	3
Amount	172,300	62,034	62,550	33,606	14,106	4
Child and dependent care credit: Number	17,940	5,972	4,979	3,579	2,966	444
Amount	7,690	2,273	2,124	1,671	1,395	227
Earned income credit [8]: Number	146,996	146,996	0	0	0	0
Amount	262,934	262,934	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	130,807	130,807	0	0	0	0
Amount	239,026	239,025	0	0	0	0
Alternative minimum tax: Number	9,056	117	306	338	1,925	6,370
Amount	42,084	416	513	539	4,334	36,284
Income tax [10]: Number	520,047	306,682	107,104	55,472	41,160	9,629
Amount	3,251,470	501,779	562,059	478,022	726,245	983,365
Total tax liability [11]: Number	553,203	339,094	107,745	55,542	41,185	9,637
Amount	3,475,927	576,277	594,529	503,899	772,475	1,028,747
Tax due at time of filing [12]: Number	112,839	58,053	22,377	12,676	14,709	5,024
Amount	371,621	51,541	41,797	33,469	75,740	169,074
Overpayments [13]: Number	637,231	483,782	85,187	41,593	24,109	2,560
Amount	1,287,951	795,555	225,156	137,030	96,779	33,429

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
WISCONSIN	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	2,737,590	1,795,258	417,381	254,640	214,851	55,460
Number of joint returns	1,136,417	379,251	289,905	223,360	194,769	49,132
Number with paid preparer's signature	1,513,415	942,015	251,142	148,151	127,946	44,161
Number of exemptions	5,238,249	2,676,078	1,036,217	725,141	636,128	164,685
Adjusted gross income (AGI) [3]	141,048,306	35,072,744	25,778,021	21,944,491	27,804,830	30,448,222
Salaries and wages in AGI [4]: Number	2,312,357	1,455,650	378,177	234,112	195,998	48,420
Amount	100,837,093	29,072,332	20,460,972	17,490,751	20,787,867	13,025,171
Taxable interest: Number	1,474,133	732,667	291,551	205,414	190,845	53,656
Amount	3,471,234	1,003,784	440,405	346,204	548,987	1,131,854
Ordinary dividends: Number	744,609	331,129	138,236	107,775	122,563	44,906
Amount	3,002,708	508,732	303,864	279,730	573,107	1,337,275
Business or profession net income (less loss):						
Number	345,639	184,554	65,563	41,811	40,144	13,567
Amount	3,637,365	905,761	573,783	467,013	859,000	831,808
Number of farm returns	63,261	38,743	11,158	6,397	5,170	1,793
Net capital gain (less loss) in AGI: Number	613,154	272,564	107,249	84,528	104,756	44,057
Amount	9,799,233	645,789	446,747	501,241	1,368,917	6,836,538
Taxable Individual Retirement Arrangements distributions: Number	260,415	149,798	46,973	29,713	26,932	6,999
Amount	2,852,313	929,101	524,425	459,967	633,301	305,520
Pensions and annuities in AGI: Number	493,549	281,489	92,083	57,760	50,363	11,854
Amount	8,223,298	2,918,281	1,826,856	1,433,151	1,595,764	449,246
Unemployment compensation: Number	270,836	179,259	54,433	25,258	11,083	803
Amount	755,453	493,881	154,801	69,671	34,230	2,869
Social Security benefits in AGI: Number	286,812	136,631	70,113	38,498	31,818	9,752
Amount	2,920,263	614,272	907,885	631,664	570,130	196,311
Self-employment retirement plans: Number	20,941	3,363	3,084	3,124	6,369	5,001
Amount	272,305	18,103	20,578	26,269	83,073	124,284
Total itemized deductions [6]: Number	1,049,845	322,322	261,179	210,861	201,631	53,852
Amount	21,735,640	4,554,951	4,222,942	3,985,233	5,059,131	3,913,383
State and local income taxes: Number	972,035	258,491	253,935	207,557	198,976	53,076
Amount	5,490,564	497,820	857,247	997,050	1,469,701	1,668,745
State and local general sales taxes: Number	67,076	53,313	7,077	3,334	2,569	783
Amount	62,928	34,414	9,447	6,002	6,710	6,354
Real estate taxes: Number	964,095	278,848	241,636	199,797	193,032	50,782
Amount	3,727,316	813,234	787,602	754,337	931,502	440,640
Taxes paid: Number	1,051,023	322,011	261,993	211,325	201,796	53,898
Amount	9,484,434	1,377,559	1,682,883	1,784,698	2,449,433	2,189,860
Mortgage Interest paid: Number	875,872	242,111	227,905	188,657	174,864	42,335
Amount	7,181,615	1,561,623	1,644,195	1,473,791	1,685,129	816,877
Contributions: Number	871,048	227,697	215,152	187,706	188,682	51,811
Amount	3,020,399	341,203	380,198	391,096	609,053	1,298,850
Taxable income: Number	2,165,248	1,224,813	416,017	254,325	214,680	55,413
Amount	96,347,186	17,310,265	16,682,383	15,143,506	20,522,616	26,688,415
Total tax credits [7]: Number	911,559	418,301	205,011	149,152	111,538	27,557
Amount	1,033,498	286,508	310,298	247,010	124,522	65,159
Child tax credit: Number	505,572	199,764	142,402	100,453	62,930	23
Amount	685,317	177,655	236,852	177,894	92,894	22
Child and dependent care credit: Number	105,164	28,913	27,324	24,232	21,562	3,133
Amount	46,082	12,292	12,158	11,013	9,253	1,367
Earned income credit [8]: Number	319,157	319,157	0	0	0	0
Amount	557,060	557,060	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	275,978	275,978	0	0	0	0
Amount	495,436	495,436	0	0	0	0
Alternative minimum tax: Number	61,727	1,044	679	1,313	17,402	41,289
Amount	288,029	1,435	1,254	2,030	31,253	252,056
Income tax [10]: Number	1,975,911	1,054,889	398,782	252,419	214,398	55,423
Amount	16,407,580	1,856,370	2,024,367	1,947,095	3,493,752	7,085,997
Total tax liability [11]: Number	2,077,179	1,150,066	404,070	253,055	214,557	55,431
Amount	17,191,680	2,114,588	2,162,674	2,052,722	3,655,739	7,205,957
Tax due at time of filing [12]: Number	520,918	240,986	100,545	63,397	84,979	31,011
Amount	1,932,040	201,913	173,299	145,074	367,289	1,044,466
Overpayments [13]: Number	2,133,825	1,505,794	307,253	184,417	120,159	16,202
Amount	4,113,615	2,099,406	778,068	567,304	463,407	205,431

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
WYOMING						
Number of returns	257,852	163,412	41,132	25,150	21,396	6,762
Number of joint returns	110,965	38,230	27,271	21,116	18,812	5,536
Number with paid preparer's signature	148,299	87,030	25,231	15,417	14,583	6,038
Number of exemptions	493,096	247,465	100,438	68,647	59,342	17,204
Adjusted gross income (AGI) [3]	17,059,474	3,132,192	2,542,135	2,166,774	2,755,531	6,462,842
Salaries and wages in AGI [4]: Number	220,709	137,045	36,875	22,895	18,920	4,974
Amount	9,385,385	2,743,150	2,039,988	1,728,801	1,884,148	989,298
Taxable interest: Number	119,847	56,255	23,030	16,750	17,288	6,524
Amount	532,749	87,442	40,832	32,773	61,132	310,570
Ordinary dividends: Number	60,889	25,710	10,887	8,586	10,528	5,178
Amount	890,969	49,752	28,995	27,206	58,807	726,208
Business or profession net income (less loss):						
Number	42,900	22,341	7,827	5,183	5,300	2,249
Amount	553,000	103,318	71,857	63,243	143,445	171,138
Number of farm returns	9,532	4,983	1,682	1,065	1,122	680
Net capital gain (less loss) in AGI: Number	55,940	23,284	9,584	7,511	10,070	5,491
Amount	2,968,910	88,728	49,223	54,975	185,874	2,590,110
Taxable Individual Retirement Arrangements distributions: Number	18,236	8,883	3,653	2,491	2,350	859
Amount	241,286	59,671	41,902	37,359	54,470	47,884
Pensions and annuities in AGI: Number	43,843	22,635	8,736	5,855	5,194	1,423
Amount	776,201	268,749	170,182	130,589	150,038	56,643
Unemployment compensation: Number	9,279	6,788	1,578	629	261	23
Amount	26,458	19,328	4,342	1,864	806	121
Social Security benefits in AGI: Number	27,040	11,806	6,524	3,675	3,305	1,730
Amount	275,953	54,318	81,213	56,111	53,802	30,507
Self-employment retirement plans: Number	1,978	247	221	249	707	554
Amount	31,553	1,371	1,698	2,447	10,941	15,096
Total itemized deductions [6]: Number	61,400	18,320	14,275	11,561	12,636	4,608
Amount	1,540,497	274,164	224,876	203,641	267,275	570,541
State and local income taxes: Number	7,872	2,072	1,721	1,362	1,642	1,075
Amount	97,335	4,990	3,055	3,226	6,681	79,383
State and local general sales taxes: Number	46,883	13,216	10,867	9,083	10,241	3,476
Amount	68,385	12,679	12,678	13,390	18,961	10,679
Real estate taxes: Number	54,420	14,642	12,686	10,754	12,012	4,326
Amount	100,607	17,634	15,127	14,456	22,469	30,923
Taxes paid: Number	60,981	17,895	14,214	11,563	12,662	4,647
Amount	297,298	41,265	36,826	37,554	56,465	125,187
Mortgage Interest paid: Number	51,624	13,695	12,275	10,440	11,443	3,771
Amount	590,241	107,497	104,265	99,901	128,282	150,295
Contributions: Number	44,900	11,186	10,033	8,771	10,629	4,281
Amount	449,950	24,077	28,296	28,897	48,032	320,650
Taxable income: Number	208,311	114,035	41,021	25,127	21,380	6,748
Amount	13,116,069	1,631,518	1,740,316	1,601,985	2,205,589	5,936,660
Total tax credits [7]: Number	82,050	36,811	19,121	13,293	9,737	3,088
Amount	125,033	26,671	29,879	21,430	11,048	36,006
Child tax credit: Number	48,745	19,880	14,146	9,365	5,354	**
Amount	68,147	18,722	24,718	16,752	7,954	**
Child and dependent care credit: Number	10,017	3,149	2,779	2,248	1,648	193
Amount	4,593	1,292	1,292	1,104	815	92
Earned income credit [8]: Number	32,538	32,538	0	0	0	0
Amount	55,168	55,167	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	28,063	28,063	0	0	0	0
Amount	49,189	49,187	0	0	0	0
Alternative minimum tax: Number	3,703	77	173	207	656	2,590
Amount	25,246	526	233	344	1,628	22,514
Income tax [10]: Number	191,238	98,537	39,595	24,995	21,360	6,751
Amount	2,536,350	175,783	220,751	220,317	387,531	1,531,969
Total tax liability [11]: Number	202,095	108,859	40,048	25,050	21,384	6,754
Amount	2,646,556	205,194	236,807	234,382	412,866	1,557,305
Tax due at time of filing [12]: Number	53,516	22,742	10,080	7,101	9,684	3,909
Amount	395,006	23,768	22,128	21,291	59,196	268,623
Overpayments [13]: Number	194,129	135,581	29,953	17,196	10,231	1,168
Amount	420,244	208,719	78,375	54,365	39,265	39,520

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

[Money amounts are in thousands of dollars]

State and item	All returns	Size of adjusted gross income				
		Under \$50,000 [1]	\$50,000 under \$75,000	\$75,000 under \$100,000	\$100,000 under \$200,000	\$200,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
OTHER AREAS [14]						
Number of returns	1,592,633	1,344,321	86,847	45,455	63,778	52,232
Number of joint returns	438,353	297,175	43,889	25,349	37,616	34,324
Number with paid preparer's signature	836,856	676,680	43,081	25,853	45,196	46,046
Number of exemptions	2,961,064	2,341,606	208,240	111,765	156,802	142,651
Adjusted gross income (AGI) [3]	67,880,751	10,628,295	5,315,353	3,927,748	8,797,917	39,211,441
Salaries and wages in AGI [4]: Number	868,289	658,956	72,810	38,403	54,213	43,907
Amount	63,463,447	19,446,372	5,411,662	3,911,646	8,560,369	26,133,398
Taxable interest: Number	553,910	375,905	50,765	31,591	49,542	46,107
Amount	2,065,589	448,346	134,293	100,414	224,672	1,157,863
Ordinary dividends: Number	239,123	122,879	26,840	18,505	33,210	37,689
Amount	3,021,877	341,458	123,861	97,651	265,054	2,193,852
Business or profession net income (less loss):						
Number	70,972	48,450	6,585	4,134	6,481	5,322
Amount	1,872,416	580,863	157,538	117,711	283,842	732,465
Number of farm returns	2,323	1,257	230	150	315	371
Net capital gain (less loss) in AGI: Number	342,755	227,449	26,912	18,332	32,286	37,776
Amount	11,590,912	1,339,799	397,701	352,262	895,786	8,605,367
Taxable Individual Retirement Arrangements distributions: Number	23,181	13,461	3,314	2,027	2,897	1,482
Amount	431,818	132,810	55,261	46,644	91,489	105,614
Pensions and annuities in AGI: Number	104,570	65,459	14,409	8,603	10,721	5,378
Amount	2,350,378	988,545	380,203	261,105	405,741	314,783
Unemployment compensation: Number	8,288	5,791	1,116	540	595	246
Amount	42,942	28,072	6,239	3,091	3,765	1,774
Social Security benefits in AGI: Number	31,959	17,061	5,800	3,139	3,965	1,994
Amount	315,955	113,829	67,745	43,785	59,130	31,469
Self-employment retirement plans: Number	4,048	831	289	284	685	1,959
Amount	103,464	8,340	3,781	4,158	14,117	73,067
Total itemized deductions [6]: Number	433,107	313,598	31,600	20,268	35,196	32,445
Amount	4,532,208	1,224,385	407,365	319,991	728,182	1,852,284
State and local income taxes: Number	335,313	252,063	21,608	13,913	24,693	23,036
Amount	1,542,709	347,436	86,760	71,890	196,203	840,419
State and local general sales taxes: Number	19,034	7,296	3,226	2,231	3,811	2,470
Amount	53,896	15,931	5,070	4,045	9,906	18,942
Real estate taxes: Number	82,205	22,279	11,857	9,516	19,313	19,240
Amount	373,806	66,739	35,818	31,520	81,528	158,200
Taxes paid: Number	384,159	272,770	29,092	18,955	33,183	30,159
Amount	2,114,992	519,340	138,515	115,255	300,307	1,041,576
Mortgage Interest paid: Number	92,109	25,772	13,694	10,398	20,647	21,598
Amount	1,440,615	271,032	152,506	119,766	273,781	623,529
Contributions: Number	113,044	45,988	14,268	10,424	20,329	22,035
Amount	634,620	62,987	43,346	37,775	86,208	404,305
Taxable income: Number	758,999	511,422	86,365	45,326	63,699	52,187
Amount	57,441,244	6,183,767	3,790,178	3,037,215	7,347,231	37,082,853
Total tax credits [7]: Number	284,691	136,741	44,960	24,331	37,388	41,271
Amount	5,759,569	143,285	154,994	130,762	495,486	4,835,042
Child tax credit: Number	87,476	48,922	22,298	10,298	5,951	7
Amount	102,084	43,087	34,433	16,816	7,740	9
Child and dependent care credit: Number	19,025	8,656	4,512	2,011	2,394	1,452
Amount	11,433	5,020	2,880	1,238	1,413	883
Earned income credit [8]: Number	28,102	28,102	0	0	0	0
Amount	47,668	47,668	0	0	0	0
Excess earned income credit (refundable) [9]:						
Number	26,511	26,511	0	0	0	0
Amount	46,504	46,505	0	0	0	0
Alternative minimum tax: Number	134,552	101,016	5,251	3,944	9,199	15,142
Amount	188,087	40,516	6,902	6,682	21,572	112,417
Income tax [10]: Number	719,679	494,044	75,145	41,619	59,407	49,464
Amount	8,829,182	676,902	477,133	435,816	1,162,043	6,077,287
Total tax liability [11]: Number	861,355	634,164	75,996	41,912	59,701	49,582
Amount	9,391,240	1,102,233	496,987	449,296	1,190,986	6,151,737
Tax due at time of filing [12]: Number	272,637	182,010	22,738	14,993	27,173	25,723
Amount	1,489,205	262,885	73,539	68,983	197,740	886,058
Overpayments [13]: Number	1,031,127	899,488	57,500	26,708	29,605	17,826
Amount	2,518,097	1,467,138	229,356	128,642	203,664	489,296

Footnotes at end of table.

Selected Historical and Other Data

Table 2. Individual Income and Tax Data, by State and Size of Adjusted Gross Income, Tax Year 2006—Continued

Footnotes

**—Not shown to avoid disclosure of information about specific taxpayers. However, the data are combined with data in an adjacent size class, as appropriate, and included in the appropriate totals.

[1] Includes returns with adjusted gross deficit.

[2] U.S. totals in Table 2 do not agree with Tables 1 and 3 because Table 2 also includes (a) "substitutes for returns," whereby the Internal Revenue Service constructs returns for certain nonfilers on the basis of available information and imposes an income tax on the resulting estimate of the tax base, i.e., "taxable income," and (b) returns of nonresident or departing aliens. In addition, for Table 2: "Income tax" includes the "alternative minimum tax," but differs from "total income tax" in Tables 1 and 3 in that it is after subtraction of all tax credits except a portion of the "earned income credit." See, also, footnote 7, below, for an explanation of the treatment of the earned income credit, and Table 1, footnotes 31, 36, and 37.

[3] Less deficit.

[4] "Number," here, and elsewhere in Table 2, represents number of returns, unless otherwise specified.

[5] Includes the Alaskan permanent fund, reported by residents of Alaska on Forms 1040A and 1040EZs. This fund only applies to statistics in the U.S. totals, and the State of Alaska.

[6] "Itemized deductions" include any amounts reported by the taxpayer, even if they could not be used in computing "taxable income," the base on which the regular income tax was computed. Thus, total itemized deductions include amounts that did not have to be reported by taxpayers with no "adjusted gross income." (Adjusted gross income is the total from which these deductions would normally be subtracted.) In addition, if standard and itemized deductions were both reported on a tax return, the form of deduction actually used in computing income tax was the one used for the statistics. Therefore, if the standard deduction was the form of deduction used, the total reported for itemized deductions was excluded from the statistics. However, the component deductions were not similarly excluded. As a result, the number of returns and related amounts for the component deductions are slightly overstated in relation to the grand total shown for itemized deductions. These components are also overstated in relation to the total because there was a statutory limitation on the total of itemized deductions that could be claimed by certain high-income taxpayers.

This limitation did not affect the component deductions, the sum of which therefore exceeded the total used in computing income tax.

[7] Unlike Table 1, "total tax credits" exclude the "earned income credit," shown separately below, in Table 2.

[8] "Earned income credit" includes both the refundable and nonrefundable portions. The nonrefundable portion could reduce income tax and certain related taxes to zero; credit amounts in excess of tax, or amounts when there was no tax liability at all, were refundable. See footnote 2, above.

[9] The refundable portion of the "earned income credit" equals the amount in excess of "total tax liability," which is shown below in Table 2 and defined in footnote 10. The excess credit shown includes any "advance earned income credit payments" for those returns that had such an excess. See also footnote 7, above.

[10] See footnote 2, above.

[11] "Total tax liability" differs from "income tax," shown above in Table 2, in that it includes the taxes from recapture of certain prior-year credits, tax applicable to individual retirement arrangements (IRAs), Social Security taxes on self-employment income and on certain tip income, and certain other income-related taxes. See also footnote 7, above, for an explanation of the treatment of the earned income credit.

[12] Reflects payments of the taxes listed in footnote 10, above.

[13] See Table 1, footnote 40.

[14] Includes, for example, returns filed from Army Post Office and Fleet Post Office addresses by members of the armed forces stationed overseas; returns filed by other U.S. citizens abroad; and returns filed by residents of Puerto Rico with income from sources outside Puerto Rico or with income earned as U.S. Government employees.

NOTES: This table presents aggregates of all returns filed and processed through the Individual Master File (IMF) system during Calendar Year 2007, including any returns filed for tax years preceding 2006.

In general, during administrative or Master File processing, taxpayer-reporting discrepancies are corrected only to the extent necessary to verify the income tax liability reported. Most of the other corrections to the taxpayer records used for these statistics could not be made because of time and resource constraints. The statistics in Table 2 should, therefore, be used with the knowledge that some of the data have not been perfected or edited for statistical purposes and that U.S. totals in this table may not be altogether comparable to U.S. totals in Tables 1 and 3, as a result. Also, see footnote 2, above for differences in tax return coverage, which affects U.S. totals in this table.

Classification by State was usually based on the taxpayer's home address. However, some taxpayers may have used the address of a tax lawyer, or accountant, or the address of a place of business; moreover, such addresses could each have been located in a State other than the State in which the taxpayer resided.

For explanation of the tax law changes which could affect the year-to-year analysis of data, refer to the respective year's "Individual Income Tax Returns, Preliminary Data" article published in the *SOI Bulletin*. For further explanation of the tax terms, refer to the "Individual Income Tax Returns," Publication 1304.

Detail may not add to totals because of rounding.

SOURCE: Internal Revenue Service, Individual Master File System.

Selected Historical and Other Data

Table 3. Number of Individual Income Tax Returns, Income, Exemptions and Deductions, Tax, and Average Tax, by Size of Adjusted Gross Income, Tax Years 2003-2005

[All figures are estimates based on samples—money amounts are in thousands of dollars except as indicated]

Size of adjusted gross income	Number of returns			Adjusted gross income or deficit		
	2003	2004	2005	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)
Total	130,423,626	132,226,042	134,372,678	6,207,108,793	6,788,805,130	7,422,495,663
No adjusted gross income [1]	1,813,840	1,854,886	1,761,041	-80,477,587	-86,318,215	- 85,463,023
\$1 under \$1,000	1,710,663	1,767,390	1,741,077	954,013	984,991	965,633
\$1,000 under \$3,000	4,899,842	4,812,040	4,846,314	9,777,515	9,793,284	9,721,344
\$3,000 under \$5,000	5,087,124	5,091,014	4,889,025	20,307,229	20,318,047	19,509,743
\$5,000 under \$7,000	5,064,951	4,789,612	4,878,808	30,293,817	28,729,457	29,202,872
\$7,000 under \$9,000	5,103,627	5,010,688	4,850,757	40,745,684	39,981,535	38,715,024
\$9,000 under \$11,000	4,972,862	4,813,678	4,745,452	49,836,139	48,205,019	47,451,175
\$11,000 under \$13,000	4,644,450	4,619,552	4,742,849	55,628,362	55,322,510	56,894,461
\$13,000 under \$15,000	4,719,522	4,558,080	4,532,055	66,114,003	63,779,262	63,524,448
\$15,000 under \$17,000	4,655,029	4,598,321	4,611,777	74,401,429	73,531,516	73,840,131
\$17,000 under \$19,000	4,459,546	4,504,928	4,367,978	80,240,246	81,105,296	78,617,916
\$19,000 under \$22,000	6,318,493	6,160,471	6,288,654	129,399,460	126,011,160	128,779,518
\$22,000 under \$25,000	5,692,051	5,722,762	5,642,356	133,640,924	134,278,064	132,412,213
\$25,000 under \$30,000	8,541,753	8,512,113	8,738,106	234,588,964	233,540,422	239,954,731
\$30,000 under \$40,000	13,957,258	13,915,453	13,940,404	484,774,627	482,760,301	483,976,301
\$40,000 under \$50,000	10,452,445	10,571,409	10,618,507	467,518,980	473,380,843	475,518,617
\$50,000 under \$75,000	17,372,492	18,047,126	18,351,037	1,065,749,827	1,109,616,155	1,127,666,344
\$75,000 under \$100,000	9,542,599	10,119,515	10,449,989	820,884,076	872,398,173	900,479,216
\$100,000 under \$200,000	8,878,643	9,735,569	10,810,367	1,170,179,856	1,288,319,611	1,430,580,576
\$200,000 under \$500,000	1,999,016	2,348,163	2,737,802	576,309,296	676,794,600	788,882,363
\$500,000 under \$1,000,000	356,140	433,145	524,506	241,211,330	293,369,864	355,220,796
\$1,000,000 under \$1,500,000	81,695	103,964	127,925	98,875,460	125,552,749	154,799,533
\$1,500,000 under \$2,000,000	34,016	45,104	56,615	58,497,902	77,754,757	97,512,430
\$2,000,000 under \$5,000,000	48,278	65,548	84,070	142,219,690	194,470,800	250,611,839
\$5,000,000 under \$10,000,000	11,168	15,835	21,431	76,311,438	108,191,995	146,846,621
\$10,000,000 or more	6,126	9,677	13,776	159,126,112	256,932,933	376,274,843

Size of adjusted gross income	Personal exemptions and total deductions			Taxable income [2]		
	2003	2004	2005	2003	2004	2005
	(7)	(8)	(9)	(10)	(11)	(12)
Total	2,238,949,953	2,359,861,118	2,542,462,832	4,200,218,439	4,670,165,637	5,137,165,874
No adjusted gross income [1]	8,675,128	9,328,549	9,179,786	0	0	0
\$1 under \$1,000	9,910,991	10,716,508	11,170,254	8,626	9,691	6,673
\$1,000 under \$3,000	31,077,061	30,432,889	31,970,722	276,350	289,949	379,934
\$3,000 under \$5,000	41,910,540	41,395,297	40,388,212	333,635	340,921	454,185
\$5,000 under \$7,000	47,745,987	45,069,558	46,717,866	1,876,190	1,796,890	1,692,642
\$7,000 under \$9,000	53,643,139	52,766,531	52,986,696	3,568,174	3,392,909	3,076,344
\$9,000 under \$11,000	56,589,271	55,587,385	55,467,845	7,286,496	6,675,881	6,342,304
\$11,000 under \$13,000	54,874,304	56,458,759	59,184,532	10,881,335	10,408,324	10,121,981
\$13,000 under \$15,000	57,758,092	57,684,267	58,090,244	16,085,533	14,476,845	14,122,879
\$15,000 under \$17,000	59,112,693	59,722,085	61,915,775	20,146,006	19,767,376	19,169,320
\$17,000 under \$19,000	58,750,540	59,605,274	59,878,268	25,175,830	25,136,857	23,483,891
\$19,000 under \$22,000	84,710,975	84,290,194	88,502,307	47,896,951	45,497,638	45,011,283
\$22,000 under \$25,000	78,328,558	79,677,101	81,169,150	57,639,442	56,725,067	54,231,809
\$25,000 under \$30,000	122,775,717	122,805,010	130,106,001	114,185,800	113,029,248	113,233,998
\$30,000 under \$40,000	213,265,987	215,492,251	224,426,890	273,848,438	269,409,156	263,351,029
\$40,000 under \$50,000	181,704,244	184,621,322	192,338,404	286,911,458	290,236,146	285,012,457
\$50,000 under \$75,000	359,053,564	381,425,867	400,417,790	707,527,353	729,503,069	730,304,487
\$75,000 under \$100,000	244,048,161	262,607,828	279,443,967	577,227,012	610,458,963	621,931,963
\$100,000 under \$200,000	295,030,870	326,060,860	377,417,890	875,871,197	962,802,185	1,054,728,764
\$200,000 under \$500,000	93,872,172	111,781,085	132,822,152	482,851,392	565,602,397	657,160,850
\$500,000 under \$1,000,000	28,534,605	33,453,478	42,108,871	212,835,816	260,116,504	313,445,881
\$1,000,000 under \$1,500,000	10,580,317	12,904,342	16,522,298	88,369,158	112,688,920	138,339,811
\$1,500,000 under \$2,000,000	6,038,155	7,839,873	9,766,863	52,503,976	69,942,269	87,812,010
\$2,000,000 under \$5,000,000	14,117,760	18,613,228	24,288,273	128,218,696	176,063,515	226,492,549
\$5,000,000 under \$10,000,000	7,809,742	10,354,672	14,074,276	68,513,593	97,901,784	132,899,011
\$10,000,000 or more	19,031,382	29,166,907	42,107,503	140,179,982	227,893,131	334,359,818

Footnotes at end of table.

Selected Historical and Other Data

Table 3. Number of Individual Income Tax Returns, Income, Exemptions and Deductions, Tax, and Average Tax, by Size of Adjusted Gross Income, Tax Years 2003-2005—Continued

[All figures are estimates based on samples—money amounts are in thousands of dollars except as indicated]

Size of adjusted gross income	Total income tax			Percentage of returns showing no total income tax		
	2003	2004	2005	2003	2004	2005
	(13)	(14)	(15)	(16)	(17)	(18)
Total	748,017,488	831,976,333	934,835,769	31.8	32.6	32.6
No adjusted gross income [1]	78,578	86,064	133,370	99.8	99.8	99.7
\$1 under \$1,000	16,345	726	486	95.8	95.2	95.8
\$1,000 under \$3,000	25,999	22,658	34,346	92.6	92.3	90.8
\$3,000 under \$5,000	30,614	31,691	37,962	92.1	94.1	94.0
\$5,000 under \$7,000	187,811	171,582	161,280	72.3	70.1	70.5
\$7,000 under \$9,000	334,350	311,163	293,083	70.6	72.2	73.5
\$9,000 under \$11,000	630,750	555,337	524,789	49.8	53.4	54.1
\$11,000 under \$13,000	971,360	921,669	904,949	49.6	50.8	51.0
\$13,000 under \$15,000	1,406,837	1,244,855	1,208,101	48.7	51.5	50.6
\$15,000 under \$17,000	1,785,236	1,733,670	1,668,868	47.7	49.1	49.4
\$17,000 under \$19,000	2,245,211	2,264,302	2,063,414	43.1	42.8	45.3
\$19,000 under \$22,000	4,367,181	4,023,617	4,013,294	39.8	41.3	40.9
\$22,000 under \$25,000	5,281,191	5,091,570	4,884,863	36.3	38.1	39.2
\$25,000 under \$30,000	11,036,040	10,675,321	10,707,197	28.7	31.3	33.0
\$30,000 under \$40,000	29,737,819	28,213,040	27,284,638	15.1	18.9	20.3
\$40,000 under \$50,000	34,635,213	33,915,520	32,877,219	7.5	10.4	12.2
\$50,000 under \$75,000	94,256,193	92,955,349	92,824,047	2.0	3.9	4.7
\$75,000 under \$100,000	84,253,116	85,557,202	85,986,486	0.6	1.0	1.2
\$100,000 under \$200,000	163,342,407	175,205,533	189,468,358	0.2	0.2	0.4
\$200,000 under \$500,000	120,711,552	139,227,163	159,395,393	0.1	0.1	0.2
\$500,000 under \$1,000,000	60,180,642	71,339,306	84,700,059	0.1	0.1	0.2
\$1,000,000 under \$1,500,000	25,551,466	31,072,424	38,052,580	0.1	0.1	0.2
\$1,500,000 under \$2,000,000	15,316,006	19,435,625	23,941,620	0.1	0.1	0.2
\$2,000,000 under \$5,000,000	36,905,426	47,962,105	60,871,637	0.1	0.1	0.2
\$5,000,000 under \$10,000,000	19,313,636	25,756,272	34,529,011	0.1	0.1	0.2
\$10,000,000 or more	35,416,509	54,202,568	78,268,719	0.2	0.1	0.3

Size of adjusted gross income	Returns showing total income tax					
	Average tax (whole dollars)			Tax as a percentage of AGI		
	2003	2004	2005	2003	2004	2005
	(19)	(20)	(21)	(22)	(23)	(24)
Total	8,412	9,337	10,319	13.0	13.3	13.6
No adjusted gross income [1]	17,377	18,890	27,319	[3]	[3]	[3]
\$1 under \$1,000	229	9	7	26.7	1.0	0.7
\$1,000 under \$3,000	72	61	77	4.0	2.7	5.6
\$3,000 under \$5,000	76	105	129	1.7	0.8	1.0
\$5,000 under \$7,000	134	120	112	2.3	1.4	1.3
\$7,000 under \$9,000	223	223	228	2.7	2.0	2.0
\$9,000 under \$11,000	253	247	241	2.5	2.8	2.7
\$11,000 under \$13,000	415	406	390	3.5	3.9	3.7
\$13,000 under \$15,000	582	563	539	4.1	4.6	4.7
\$15,000 under \$17,000	733	740	715	4.6	6.0	5.8
\$17,000 under \$19,000	884	879	863	4.9	6.9	6.0
\$19,000 under \$22,000	1,149	1,113	1,080	5.6	4.7	5.0
\$22,000 under \$25,000	1,457	1,437	1,423	6.2	2.4	2.3
\$25,000 under \$30,000	1,812	1,825	1,828	6.6	8.5	6.9
\$30,000 under \$40,000	2,508	2,500	2,457	7.2	7.2	7.1
\$40,000 under \$50,000	3,582	3,582	3,526	8.0	8.0	7.9
\$50,000 under \$75,000	5,536	5,357	5,307	9.0	8.7	8.6
\$75,000 under \$100,000	8,882	8,538	8,324	10.3	9.9	9.7
\$100,000 under \$200,000	18,432	18,028	17,597	14.0	13.6	13.3
\$200,000 under \$500,000	60,453	59,350	58,339	21.0	20.6	20.2
\$500,000 under \$1,000,000	169,166	164,839	161,826	25.0	24.3	23.9
\$1,000,000 under \$1,500,000	313,177	299,098	298,155	25.9	24.8	24.6
\$1,500,000 under \$2,000,000	450,683	431,280	423,783	26.2	25.0	24.6
\$2,000,000 under \$5,000,000	765,117	732,235	725,829	26.0	24.7	24.4
\$5,000,000 under \$10,000,000	1,730,613	1,627,363	1,615,166	25.3	23.8	23.6
\$10,000,000 or more	5,792,690	5,604,070	5,695,999	22.4	21.1	20.9

Footnotes at end of table.

Table 3. Number of Individual Income Tax Returns, Income, Exemptions and Deductions, Tax, and Average Tax, by Size of Adjusted Gross Income, Tax Years 2003-2005—Continued

Footnotes

[1] In addition to low-income taxpayers, this size class (and others) includes taxpayers with "tax preferences," not reflected in "adjusted gross income" or "taxable income," which are subject to the "alternative minimum tax" (included in "total income tax"), defined in Table 1, footnote 34.

[2] "Adjusted gross income" (AGI) minus "personal exemptions and total deductions" will not equal "taxable income" because the total of deductions and exemptions could exceed AGI and, therefore, includes amounts that could not be used in computing "taxable income."

[3] Not computed.

NOTES: Detail may not add to totals because of rounding. All amounts are in current dollars. Most of the data are subject to sampling error. Tax law and tax form changes affect the year-to-year comparability of the data. Percentages shown in this table are based on dollar amounts rounded to the units indicated in the specific table heading. Therefore, they may not be as precise as percentages based on the fuller dollar amounts found in tables contained in the source publications or articles which underlie the historical tables presented in this section of the *Bulletin*.

SOURCE: *Statistics of Income—Individual Income Tax Returns*, appropriate years.

Selected Historical and Other Data

Table 4. Comparison of Personal Income in the National Income and Product Accounts (NIPA) with Adjusted Gross Income (AGI), for Specified Tax Years, 1995-2005

[All figures are estimates—money amounts are in billions of dollars]

Income and adjustment items	1995	2000	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)
Personal income (per NIPA) [1]	6,152.3	8,429.7	8,881.9	9,163.6	9,727.2	10,301.1
Less: Portion of personal income not included in AGI	2,234.2	2,971.3	3,243.9	3,368.7	3,575.8	3,662.4
Nontaxable transfer payments	797.5	962.0	1,126.5	1,187.3	1,262.4	1,350.1
Employer contributions to employee pension and insurance funds	493.6	609.9	745.1	815.6	868.5	927.7
Imputed income [2]	186.7	265.8	294.8	271.6	274.1	208.4
Investment income of life insurance carriers and pension plans	369.1	497.3	432.0	429.2	435.3	492.1
Investment income received by nonprofit institutions or retained by fiduciaries	60.0	75.6	60.0	55.8	62.1	63.7
Net differences in accounting treatment (NIPA vs. IRS)	83.8	159.4	146.0	142.0	157.3	43.0
Other excluded or tax-exempt income	243.4	401.4	439.5	467.2	516.2	577.4
Plus: Portion of AGI not included in personal income	841.7	1,667.1	1,338.9	1,440.0	1,735.1	2,069.7
Personal contributions for social insurance	268.8	359.2	384.8	396.5	420.5	445.7
Net gain from the sale of assets	167.4	645.4	236.4	294.0	476.2	671.7
Taxable pensions	293.2	414.2	462.7	491.4	522.7	560.0
Small business corporation income	79.2	128.2	138.5	148.6	195.1	250.7
Other types of income	33.2	120.0	116.5	109.4	120.6	141.6
Equals: BEA-derived adjusted gross income	4,759.8	7,125.4	6,976.8	7,234.9	7,886.4	8,708.4
Adjusted gross income, IRS	4,189.4	6,365.4	6,033.6	6,207.1	6,788.8	7,422.5
Adjusted gross income (AGI) gap [3]	570.4	760.1	943.2	1,027.8	1,097.6	1,285.9
AGI gap as a percentage of BEA-derived AGI	12.0	10.7	13.5	14.2	13.9	14.8
AGI of IRS as a percentage of BEA-derived AGI	88.0	89.3	86.5	85.8	86.1	85.2

[1] Reflects changes made to data as part of the 2003 Comprehensive Revision of the National Income and Product Accounts (NIPAs). For details of this revision, see the Bureau of Economic Analysis Web site at: <http://www.bea.gov/bea/dn/2003benchmark/CR2003content.htm>.

[2] Consists of imputed rental income of owner-occupied nonfarm dwellings (less actual rental income and subsidies); services to individuals furnished without payment by certain financial intermediaries; premium supplements to individuals for property and casualty insurance; farm products consumed on farms; food furnished to employees, including military and domestic service; clothing issued to military personnel; employee's lodging; and imputed income of individuals participating in the construction of their own housing.

[3] Consists of income earned by low-income individuals who are not required to file income tax returns, of unreported income that is included in the NIPA measure, and of errors and omissions which comprise items in the portion of personal income not included in AGI and the portion of AGI not included in personal income. Also includes the net effect of errors in the IRS adjusted gross income and NIPA personal income measures. Such errors can arise from the sample used by the IRS to estimate AGI and from the source data used by BEA to estimate personal income (per NIPA).

NOTES: Detail may not add to totals because of rounding. All amounts are in current dollars. Tax law and tax form changes affect the year-to-year comparability of the data.

SOURCE: U.S. Department of Commerce, Bureau of Economic Analysis, National Income and Product Accounts (NIPAs), Table 7.19: Comparison of Personal Income in the National Income and Product Accounts with Adjusted Gross Income as Published by the Internal Revenue Service. This table appears periodically in the *Survey of Current Business* and can also be accessed online at: <http://www.bea.gov/bea/dn/nipaweb/index.asp>.

Selected Historical and Other Data

Table 5. Personal Income and Total Adjusted Gross Income Based on Individual Income Tax Returns per National Income and Product Accounts (NIPA), Tax Years 1950-2005

[All figures are estimates—money amounts are in billions of dollars]

Tax year	Personal income (per NIPA) [1,2]	Total adjusted gross income (AGI) (per NIPA) [1,2,3]	Difference	
			Amount [2,3]	Percentage of personal income [2,3]
	(1)	(2)	(3)	(4)
1950	229.0	202.5	26.5	11.6
1951	258.0	229.3	28.7	11.1
1952	275.4	241.6	33.8	12.3
1953	291.9	256.1	35.8	12.3
1954	294.5	257.3	37.2	12.6
1955	316.1	278.7	37.4	11.8
1956	339.6	299.4	40.2	11.8
1957	358.7	312.6	46.1	12.9
1958	369.0	315.8	53.2	14.4
1959	392.8	341.8	51.0	13.0
1960	411.5	354.0	57.5	14.0
1961	429.0	368.0	61.0	14.2
1962	456.7	390.0	66.7	14.6
1963	479.6	411.0	68.6	14.3
1964	514.6	443.9	70.7	13.7
1965	555.7	480.6	75.1	13.5
1966	603.9	521.2	82.7	13.7
1967	648.3	551.3	97.0	15.0
1968	712.0	605.6	106.4	14.9
1969	778.5	659.8	118.7	15.2
1970	838.8	696.4	142.4	17.0
1971	903.5	742.8	160.7	17.8
1972	992.7	824.5	168.2	16.9
1973	1,110.7	925.0	185.7	16.7
1974	1,222.6	1,003.5	219.1	17.9
1975	1,335.0	1,046.8	288.2	21.6
1976	1,474.8	1,168.0	306.8	20.8
1977	1,633.2	1,296.1	337.1	20.6
1978	1,837.7	1,466.4	371.3	20.2
1979	2,062.2	1,654.1	408.1	19.8
1980	2,307.9	1,830.3	477.6	20.7
1981	2,591.3	2,016.3	575.0	22.2
1982	2,775.3	2,098.6	676.7	24.4
1983	2,960.7	2,225.6	735.1	24.8
1984	3,289.5	2,472.6	816.9	24.8
1985	3,526.7	2,631.6	895.1	25.4
1986	3,722.4	2,853.2	869.2	23.4
1987	3,947.4	3,121.1	826.3	20.9
1988	4,253.7	3,411.9	841.8	19.8
1989	4,587.8	3,649.7	938.1	20.4
1990	4,878.6	3,798.4	1,080.2	22.1
1991	5,051.0	3,856.8	1,194.2	23.6
1992	5,362.0	4,092.0	1,270.0	23.7
1993	5,558.5	4,245.4	1,313.1	23.6
1994	5,842.5	4,473.7	1,368.8	23.4
1995	6,152.3	4,759.8	1,392.5	22.6
1996	6,520.6	5,144.5	1,376.1	21.1
1997	6,915.1	5,578.0	1,337.1	19.3
1998	7,423.0	6,120.2	1,302.8	17.6
1999	7,802.4	6,553.5	1,248.9	16.0
2000	8,429.7	7,125.4	1,304.3	15.5
2001	8,724.1	7,005.0	1,719.1	19.7
2002	8,881.9	6,976.8	1,905.1	21.4
2003	9,163.6	7,234.9	1,928.7	21.0
2004	9,727.2	7,886.4	1,840.8	18.9
2005	10,301.1	8,708.4	1,592.7	15.5

Footnotes at end of table.

Selected Historical and Other Data

Table 5. Personal Income and Total Adjusted Gross Income Based on Individual Income Tax Returns per National Income and Product Accounts (NIPA), Tax Years 1950-2004—Continued

Footnotes

[1] See Table 4 for the differences between "personal income" and "adjusted gross income" (AGI).

[2] Reflects changes made to data as part of the 2003 Comprehensive Revision of the National Income and Product Accounts (NIPAs). For details of this revision, see the Bureau of Economic Analysis Web site at <http://www.bea.gov/bea/dn/2003benchmark/CR2003content.htm>.

[3] Data for years 1987 and after are not comparable to pre-1987 data because of major changes in the definition of "adjusted gross income" (AGI).

NOTES: Detail may not add to totals because of rounding. All amounts are in current dollars. Most of the data are subject to sampling error. Tax law and tax form changes affect the year-to-year comparability of the data. Percentages shown in this table are based on dollar amounts rounded to the units indicated in the specific table heading. Therefore, they may not be as precise as percentages based on the fuller dollar amounts found in tables contained in the source publications or articles which underlie the historical tables presented in this section of the *Bulletin*.

SOURCE: Data on "personal income" and "adjusted gross income" (AGI) (per NIPAs) are from U.S. Department of Commerce, Bureau of Economic Analysis, National Income and Product Accounts (NIPAs), Table 7.19: Comparison of Personal Income in the National Income and Product Accounts with Adjusted Gross Income as Published by the Internal Revenue Service. This table appears periodically in the *Survey of Current Business* and can also be accessed online at: <http://www.bea.gov/bea/dn/nipaweb/index.asp>.

Selected Historical and Other Data

Table 6. Total Adjusted Gross Income Estimated From National Income and Product Accounts (NIPA) and as Reported on Individual Income Tax Returns per Statistics of Income (SOI), Tax Years 1950-2005

[All figures are estimates—money amounts are in billions of dollars]

Tax year	Adjusted gross income (AGI)		Difference	
	Total	Reported on tax	Amount [2]	Percentage of total (per NIPA) [2]
	(per NIPA) [1]	returns (per SOI) [2]		
	(1)	(2)	(3)	(4)
1950	202.5	179.1	23.4	11.6
1951	229.3	202.3	27.0	11.8
1952	241.6	215.3	26.3	10.9
1953	256.1	228.7	27.4	10.7
1954	257.3	229.2	28.1	10.9
1955	278.7	248.5	30.2	10.8
1956	299.4	267.7	31.7	10.6
1957	312.6	280.3	32.3	10.3
1958	315.8	281.2	34.6	11.0
1959	341.8	305.1	36.7	10.7
1960	354.0	315.5	38.5	10.9
1961	368.0	329.9	38.1	10.4
1962	390.0	348.7	41.3	10.6
1963	411.0	368.8	42.2	10.3
1964	443.9	396.7	47.2	10.6
1965	480.6	429.2	51.4	10.7
1966	521.2	468.5	52.7	10.1
1967	551.3	504.8	46.5	8.4
1968	605.6	554.4	51.2	8.5
1969	659.8	603.5	56.3	8.5
1970	696.4	631.7	64.7	9.3
1971	742.8	673.6	69.2	9.3
1972	824.5	746.0	78.5	9.5
1973	925.0	827.1	97.9	10.6
1974	1,003.5	905.5	98.0	9.8
1975	1,046.8	947.8	99.0	9.5
1976	1,168.0	1,053.9	114.1	9.8
1977	1,296.1	1,158.5	137.6	10.6
1978	1,466.4	1,302.4	164.0	11.2
1979	1,654.1	1,465.4	188.7	11.4
1980	1,830.3	1,613.7	216.6	11.8
1981	2,016.3	1,772.6	243.7	12.1
1982	2,098.6	1,852.1	246.5	11.7
1983	2,225.6	1,942.6	283.0	12.7
1984	2,472.6	2,139.9	332.7	13.5
1985	2,631.6	2,306.0	325.6	12.4
1986	2,853.2	2,481.7	371.5	13.0
1987	3,121.1	2,773.8	347.3	11.1
1988	3,411.9	3,083.0	328.9	9.6
1989	3,649.7	3,256.4	393.3	10.8
1990	3,798.4	3,405.4	393.0	10.3
1991	3,856.8	3,464.5	392.3	10.2
1992	4,092.0	3,629.1	462.9	11.3
1993	4,245.4	3,723.3	522.1	12.3
1994	4,473.7	3,907.5	566.2	12.7
1995	4,759.8	4,189.4	570.4	12.0

Footnotes at end of table.

Selected Historical and Other Data

Table 6. Total Adjusted Gross Income Estimated From National Income and Product Accounts (NIPA) and as Reported on Individual Income Tax Returns per Statistics of Income (SOI), Tax Years 1950-2005—Continued

[All figures are estimates—money amounts are in billions of dollars]

Tax year	Adjusted gross income (AGI)		Difference	
	Total (per NIPA) [1]	Reported on tax returns (per SOI) [2]	Amount [2]	Percentage of total (per NIPA) [2]
	(1)	(2)	(3)	(4)
1996	5,144.5	4,536.0	608.5	11.8
1997	5,578.0	4,969.9	608.1	10.9
1998	6,120.2	5,416.0	704.2	11.5
1999	6,553.5	5,855.5	698.0	10.7
2000	7,125.4	6,365.4	760.0	10.7
2001	7,005.0	6,170.6	834.4	11.9
2002	6,976.8	6,033.6	943.2	13.5
2003	7,234.9	6,207.1	1,027.8	14.2
2004	7,886.4	6,788.8	1,097.6	13.9
2005	8,708.4	7,422.5	1,285.9	14.8

[1] Reflects changes made to data as part of the 2003 Comprehensive Revision of the National Income and Product Accounts (NIPAs). For details of this revision, see the Bureau of Economic Analysis Web site at <http://www.bea.gov/bea/dn/2003benchmark/CR2003content.htm>.

[2] Data for years 1987 and after are not comparable to pre-1987 data because of major changes in the definition of "adjusted gross income" (AGI).

NOTES: Detail may not add to totals because of rounding. All amounts are in current dollars. Most of the data are subject to sampling error. Tax law and tax form changes affect the year-to-year comparability of the data. Percentages shown in this table are based on dollar amounts rounded to the units indicated in the specific table heading. Therefore, they may not be as precise as percentages based on the fuller dollar amounts found in tables contained in the source publications or articles which underlie the historical tables presented in this section of the *Bulletin*.

SOURCE: Data on "adjusted gross income" (AGI) (per NIPAs) are from U.S. Department of Commerce, Bureau of Economic Analysis, National Income and Product Accounts (NIPAs), Table 7.19: Comparison of Personal Income in the National Income and Product Accounts with Adjusted Gross Income as Published by the Internal Revenue Service. This table appears periodically in the Survey of Current Business and can also be accessed online at: <http://www.bea.gov/bea/dn/nipaweb/index.asp>. Data on "adjusted gross income" (AGI) (per SOI) are from *Statistics of Income—Individual Income Tax Returns*, appropriate years.

Selected Historical and Other Data

Table 7. Standard, Itemized, and Total Deductions Reported on Individual Income Tax Returns, Tax Years 1950-2005

[All figures are estimates based on samples—number of returns is in millions; money amounts are in billions of dollars]

Tax year	Total number of returns	Total deductions		Standard deduction		Itemized deductions	
		Amount [1]	As a percentage of adjusted gross income (AGI) [2]	Number of returns [3]	Amount [4]	Number of returns [3]	Amount [5]
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
1950	53.1	21.9	12.2	42.7	12.0	10.3	9.9
1951	55.4	25.2	12.5	43.9	13.3	11.6	11.9
1952	56.5	27.3	12.7	43.7	13.7	12.8	13.6
1953	57.8	29.8	13.0	43.4	14.2	14.4	15.6
1954	56.7	30.7	13.4	41.0	13.3	15.7	17.4
1955	58.3	33.6	13.5	40.9	13.6	16.9	20.0
1956	59.2	36.4	13.6	40.3	13.8	18.5	22.6
1957	59.8	39.5	14.1	39.3	13.8	20.2	25.7
1958	59.1	40.7	14.5	37.9	13.2	20.8	27.5
1959	60.3	45.4	14.9	37.3	13.4	22.5	32.0
1960	61.0	48.4	15.3	36.5	13.1	24.1	35.3
1961	61.5	51.3	15.6	35.8	12.9	25.3	38.4
1962	62.7	54.8	15.7	35.8	13.1	26.5	41.7
1963	63.9	59.2	16.1	35.4	13.1	28.2	46.1
1964	65.4	67.0	16.9	38.0	20.2	26.9	46.8
1965	67.6	71.4	16.6	39.3	20.6	27.9	50.7
1966	70.2	76.4	16.3	41.2	21.8	28.6	54.6
1967	71.7	81.7	16.2	41.5	22.1	29.8	59.6
1968	73.7	91.3	16.5	41.3	22.1	32.0	69.2
1969	75.8	101.8	16.9	40.5	21.6	34.9	80.2
1970	74.3	120.5	19.1	38.4	32.4	35.4	88.2
1971	74.6	139.9	20.8	43.5	48.1	30.7	91.9
1972	77.6	166.4	22.3	50.2	69.8	27.0	96.7
1973	80.7	180.6	21.8	52.2	73.6	28.0	107.0
1974	83.3	195.5	21.6	53.2	76.1	29.6	119.4
1975	82.2	233.2	24.6	55.5	100.9	26.1	122.3
1976	84.7	247.6	23.5	58.2	113.8	26.0	133.9
1977	86.6	276.2	23.8	58.8	137.7	22.9	138.5
1978	89.8	304.3	23.4	59.5	139.8	25.8	164.4
1979	92.7	333.0	22.7	60.7	148.8	26.5	184.2
1980	93.9	364.0	22.6	59.5	146.0	29.0	218.0
1981	95.4	401.2	22.6	58.7	144.7	31.6	256.4
1982	95.3	425.2	23.0	56.9	140.2	33.4	284.5
1983	96.3	448.7	23.1	56.2	138.5	35.2	309.6
1984	99.4	499.6	23.3	56.7	139.5	38.2	358.9
1985	101.7	554.7	24.1	57.0	145.0	39.8	405.0
1986	103.0	611.3	24.6	56.5	151.0	40.7	447.1
1987	107.0	607.2	21.9	69.1	215.2	35.6	392.0
1988	109.7	686.0	22.3	76.5	289.6	31.9	395.2
1989	112.1	740.4	22.7	79.3	309.4	32.0	431.0
1990	113.7	789.9	23.2	80.6	331.5	32.2	458.5
1991	114.7	818.8	23.6	81.3	351.1	32.5	467.7
1992	113.6	848.5	23.4	80.1	366.5	32.5	481.9
1993	114.6	872.5	23.4	80.8	382.1	32.8	490.4
1994	115.9	890.8	22.8	81.9	397.1	33.0	493.7
1995	118.2	941.0	22.5	83.2	413.6	34.0	527.4
1996	120.4	998.6	22.0	84.0	426.1	35.4	572.5
1997	122.4	1,062.5	21.4	84.8	441.7	36.6	620.8
1998	124.8	1,135.9	21.0	85.6	459.5	38.2	676.5
1999	127.1	1,205.3	20.6	85.8	464.0	40.2	741.4
2000	129.4	1,293.2	20.3	85.7	470.8	42.5	822.4

Footnotes at end of table.

Selected Historical and Other Data

Table 7. Standard, Itemized, and Total Deductions Reported on Individual Income Tax Returns, Tax Years 1950-2005—Continued

[All figures are estimates based on samples—number of returns is in millions; money amounts are in billions of dollars]

Tax year	Total number of returns	Total deductions		Standard deduction		Itemized deductions	
		Amount [1]	As a percentage of adjusted gross income (AGI) [2]	Number of returns [3]	Amount [4]	Number of returns [3]	Amount [5]
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
2001	130.3	1,366.4	22.1	84.2	467.0	44.6	884.5
2002	130.1	1,390.1	23.0	82.7	477.2	45.6	898.0
2003	130.4	1,457.6	23.5	84.6	539.9	43.9	901.9
2004	132.2	1,559.2	23.0	84.0	545.1	46.3	998.2
2005	134.4	1,702.6	22.9	84.8	580.7	47.8	1,121.8

[1] Sum of standard and itemized deductions, plus charitable contributions deduction reported on standard deduction returns for Tax Years 1982-1986. Amount of total deductions for 1950-1957 was estimated by Joseph A. Pechman, The Brookings Institution, using his estimate of the standard deduction for these years (see footnote 4) plus the total for itemized deductions published in *Statistics of Income—Part 1 for 1950-1953* and *Statistics of Income—Individual Income Tax Returns for 1954-1957*. Starting with 1958, total deductions were obtained directly from *Statistics of Income—Individual Income Tax Returns*. Deductions exclude amounts shown as “statutory adjustments” in Table 1. For Tax Years 1987-1988, total deductions also include the “zero bracket amount” reported on a small number of returns (see footnote 4). It includes total deductions as reported by taxpayers, even if the total exceeded “adjusted gross income” (AGI) and, therefore, could not be used.

[2] See Table 5, footnote 3.

[3] Series revised, starting with the spring 1997 *Bulletin*, to exclude from the standard deduction statistics the relatively small number of returns with no adjusted gross income and no deductions. Previously, these returns were classified as if they showed a standard deduction. For the 1977-1986 statistics, the standard deduction is the “zero bracket amount” (reported on returns with only a “zero bracket amount”). Such an amount was also included for a small number of returns for 1987-1988 (see footnote 4). For years in which the “zero bracket amount” was in effect, frequencies shown for standard deduction returns were derived by subtracting the number reporting an income tax liability, but no itemized deductions, from the total of all returns. For 1950-1952, returns with itemized deductions include the small number of returns with no deductions and, for 1950-1954, the small number with no income, regardless of whether or not deductions were itemized. For later years, returns in these two categories were excluded from all the deduction statistics in this table.

[4] Amount of standard deduction for 1950-1957 was estimated by Joseph A. Pechman, The Brookings Institution, on the basis of the distribution of the number of returns by income class and marital status in *Statistics of Income—Part 1 for 1950-1953* and *Statistics of Income—Individual Income Tax Returns for 1954-1957*, and, starting with 1958, was obtained directly from *Statistics of Income—Individual Income Tax Returns*. It represents the “zero bracket amount” for 1977-1986. Starting with 1987, it represents the sum of “basic” and “additional” standard deductions (for age 65 or over and for blindness); also includes the “zero bracket amount” reported on the small number of prior-year returns filed in 1988-1989 that were included in the 1987-1988 statistics as proxies for returns due but not received.

[5] For 1977-1986, total itemized deductions are before subtraction of the “zero bracket amount.” Starting with 1991, total itemized deductions are after statutory limitation (see Table 1, footnote 25).

NOTES: Detail may not add to totals because of rounding. All amounts are in current dollars. Most of the data are subject to sampling error. Tax law and tax form changes affect the year-to-year comparability of the data. Percentages shown in this table are based on dollar amounts rounded to the units indicated in the specific table heading. Therefore, they may not be as precise as percentages based on the fuller dollar amounts found in tables contained in the source publications or articles which underlie the historical tables presented in this section of the *Bulletin*.

SOURCE: Except as indicated in footnotes 1 and 4, *Statistics of Income—Individual Income Tax Returns* and unpublished tables, appropriate years. Data referred to in footnote 4 which are attributed to Joseph A. Pechman are from Pechman 1987, *Federal Tax Policy*, fifth edition, The Brookings Institution. See also “General notations and statements,” preceding the footnotes section.

Selected Historical and Other Data

Table 8. Personal Income per National Income and Product Accounts (NIPA), and Taxable Income and Individual Income Tax per Statistics of Income (SOI), Tax Years 1950-2005

[All figures are estimates—money amounts are in billions of dollars]

Tax year	Personal income (per NIPA) [1,2]	Taxable income (per SOI) [3]		Total income tax (per SOI) [3]		
		Amount	As a percentage of personal income	Amount	As a percentage of—	
					Personal income	Taxable income
	(1)	(2)	(3)	(4)	(5)	(6)
1950	229.0	84.3	36.8	18.4	8.0	21.8
1951	258.0	99.2	38.4	24.2	9.4	24.4
1952	275.4	107.2	38.9	27.8	10.1	25.9
1953	291.9	114.3	39.2	29.4	10.1	25.7
1954	294.5	115.3	39.2	26.7	9.1	23.2
1955	316.1	128.0	40.5	29.6	9.4	23.1
1956	339.6	141.5	41.7	32.7	9.6	23.1
1957	358.7	149.4	41.7	34.4	9.6	23.0
1958	369.0	149.3	40.5	34.3	9.3	23.0
1959	392.8	166.5	42.4	38.6	9.8	23.2
1960	411.5	171.6	41.7	39.5	9.6	23.0
1961	429.0	181.8	42.4	42.2	9.8	23.2
1962	456.7	195.3	42.8	44.9	9.8	23.0
1963	479.6	209.1	43.6	48.2	10.1	23.1
1964	514.6	229.9	44.7	47.2	9.2	20.5
1965	555.7	255.1	45.9	49.6	8.9	19.4
1966	603.9	286.3	47.4	56.1	9.3	19.6
1967	648.3	315.1	48.6	63.0	9.7	20.0
1968	712.0	352.8	49.6	76.7	10.8	21.7
1969	778.5	388.8	49.9	86.6	11.1	22.3
1970	838.8	401.2	47.8	83.9	10.0	20.9
1971	903.5	414.0	45.8	85.4	9.5	20.6
1972	992.7	447.6	45.1	93.6	9.4	20.9
1973	1,110.7	511.9	46.1	108.1	9.7	21.1
1974	1,222.6	573.6	46.9	123.6	10.1	21.5
1975	1,335.0	595.5	44.6	124.5	9.3	20.9
1976	1,474.8	674.9	45.8	141.8	9.6	21.0
1977	1,633.2	733.8	44.9	159.8	9.8	21.8
1978	1,837.7	846.4	46.1	188.2	10.2	22.2
1979	2,062.2	926.6	44.9	214.5	10.4	23.1
1980	2,307.9	1,045.2	45.3	250.3	10.8	23.9
1981	2,591.3	1,170.1	45.2	284.1	11.0	24.3
1982	2,775.3	1,231.9	44.4	277.6	10.0	22.5
1983	2,960.7	1,300.2	43.9	274.2	9.3	21.1
1984	3,289.5	1,447.0	44.0	301.9	9.2	20.9
1985	3,526.7	1,550.5	44.0	325.7	9.2	21.0
1986	3,722.4	1,665.6	44.7	367.3	9.9	22.1
1987	3,947.4	1,850.6	46.9	369.2	9.4	20.0
1988	4,253.7	2,070.0	48.7	412.9	9.7	19.9
1989	4,587.8	2,173.3	47.4	432.9	9.4	19.9
1990	4,878.6	2,263.7	46.4	447.1	9.2	19.8
1991	5,051.0	2,284.1	45.2	448.4	8.9	19.6
1992	5,362.0	2,395.7	44.7	476.2	8.9	19.9
1993	5,558.5	2,453.5	44.1	502.8	9.0	20.5
1994	5,842.5	2,598.0	44.5	534.9	9.2	20.6
1995	6,152.3	2,813.8	45.7	588.4	9.6	20.9
1996	6,520.6	3,089.7	47.4	658.2	10.1	21.3
1997	6,915.1	3,429.1	49.6	731.3	10.6	21.3
1998	7,423.0	3,780.8	50.9	788.5	10.6	20.9
1999	7,802.4	4,136.1	53.0	877.4	11.2	21.2
2000	8,429.7	4,544.2	53.9	980.6	11.6	21.6

Footnotes at end of table.

Selected Historical and Other Data

Table 8. Personal Income per National Income and Product Accounts (NIPA), and Taxable Income and Individual Income Tax per Statistics of Income (SOI), Tax Years 1950-2005—Continued

[All figures are estimates—money amounts are in billions of dollars]

Tax year	Personal income (per NIPA) [1,2]	Taxable income (per SOI) [3]		Total income tax (per SOI) [3]		
		Amount	As a percentage of personal income	Amount	As a percentage of—	
					Personal income	Taxable income
	(1)	(2)	(3)	(4)	(5)	(6)
2001	8,724.1	4,268.5	48.9	888.0	10.2	20.8
2002	8,881.9	4,096.1	46.1	797.0	9.0	19.5
2003	9,163.6	4,200.2	45.8	748.0	8.2	17.8
2004	9,727.2	4,670.2	48.0	832.0	8.6	17.8
2005	10,301.1	5,137.2	49.9	934.9	9.1	18.2

[1] See Table 4 for differences between "personal income" and "adjusted gross income."

[2] Reflects changes made to data as part of the 2003 Comprehensive Revision of the National Income and Product Accounts (NIPAs). For details of this revision, see the Bureau of Economic Analysis Web site at <http://www.bea.gov/bea/dn/2003benchmark/CR2003content.htm>.

[3] Note that the "taxable income" tax base excludes the base for computing both the "minimum tax" and "alternative minimum tax" components of "total income tax." Therefore, the percentages shown in column 6, starting with 1970, are only approximate. See also Table 1, footnote 34. Also, because conceptually "taxable income" did not exist prior to 1954, the taxable income shown for 1950-1953 and the percentages based on it in columns 3 and 6 are estimated, in part, by adjusting available statistics for statutory "net income" for these years.

NOTES: Detail may not add to totals because of rounding. All amounts are in current dollars. Percentages shown in this table are based on dollar amounts rounded to the units indicated in the specific table heading. Therefore, they may not be as precise as percentages based on the fuller dollar amounts found in tables contained in the source publications or articles which underlie the historical tables presented in this section of the *Bulletin*.

SOURCE: Data on "Personal income" are from the Bureau of Economic Analysis's National Income and Product Accounts, Table 2.1: Personal Income and Its Disposition.

This table appears in the *Survey of Current Business* and can also be accessed online at: <http://www.bea.gov/bea/dn/nipaweb/index.asp>. Data on

"Taxable income (per SOI)" and "Total income tax (per SOI)" are from *Statistics of Income—Individual Income Tax Returns*, various years.

Selected Historical and Other Data

Table 9. Number of Individual Income Tax Returns, by Type of Tax Settlement, Tax Years 1950-2005

[All figures are estimates based on samples—number of returns is in millions]

Tax year	Total number of returns	Number of returns with--		
		Tax due at time of filing	Overpayments [1]	No overpayments or tax due at time of filing
	(1)	(2)	(3)	(4)
1950	53.1	14.3	32.0	6.8
1951	55.4	18.6	31.0	5.8
1952	56.5	19.3	32.1	5.1
1953	57.8	19.0	32.7	6.2
1954	56.7	16.6	35.2	5.0
1955	58.3	18.7	35.4	4.2
1956	59.2	19.4	36.1	3.7
1957	59.8	18.6	37.6	3.6
1958	59.1	18.1	37.4	3.6
1959	60.3	19.1	38.4	2.8
1960	61.0	18.1	39.4	3.5
1961	61.5	18.6	40.0	2.9
1962	62.7	18.7	40.9	3.1
1963	63.9	19.3	41.4	3.3
1964	65.4	22.5	39.3	3.5
1965	67.6	20.0	44.3	3.2
1966	70.2	17.8	49.4	3.0
1967	71.7	17.5	51.2	3.0
1968	73.7	20.3	50.6	2.8
1969	75.8	17.9	54.9	3.0
1970	74.3	16.5	55.3	2.5
1971	74.6	17.0	55.3	2.4
1972	77.6	11.9	63.3	2.3
1973	80.7	14.2	64.2	2.2
1974	83.3	15.4	65.8	2.1
1975	82.2	15.8	63.8	2.6
1976	84.7	16.9	65.0	2.8
1977	86.6	17.8	66.0	2.8
1978	89.8	21.6	65.5	2.7
1979	92.7	18.8	71.4	2.4
1980	93.9	21.8	69.9	2.3
1981	95.4	23.0	70.0	2.4
1982	95.3	20.3	72.4	2.6
1983	96.3	18.5	75.0	2.9
1984	99.4	21.2	75.6	2.7
1985	101.7	21.2	77.4	3.0
1986	103.0	21.5	78.1	3.5
1987	107.0	23.8	79.8	3.4
1988	109.7	27.2	79.1	3.4
1989	112.1	28.0	80.9	3.2
1990	113.7	27.0	83.5	3.2
1991	114.7	25.6	85.6	3.5
1992	113.6	29.0	81.0	3.6
1993	114.6	28.6	82.4	3.6
1994	115.9	27.6	85.1	3.2
1995	118.2	29.7	85.3	3.2
1996	120.4	30.6	86.5	3.3
1997	122.4	31.2	88.3	2.9
1998	124.8	28.4	93.4	3.0
1999	127.1	29.2	94.8	3.1
2000	129.4	30.6	95.9	2.9
2001	130.3	24.6	102.3	3.4
2002	130.1	22.8	103.5	3.8
2003	130.4	21.1	105.4	4.0
2004	132.2	24.5	103.7	4.0
2005	134.4	25.7	104.8	3.9

Selected Historical and Other Data

Table 9. Number of Individual Income Tax Returns, by Type of Tax Settlement, Tax Years 1950-2005—Continued

Footnotes

[1] Starting with 1975, includes the refundable portion of the "earned income credit."

NOTES: Detail may not add to totals because of rounding. Most of the data are subject to sampling error. Tax law and tax form changes affect the year-to-year comparability of the data.

SOURCE: *Statistics of Income—Individual Income Tax Returns* and unpublished tables, appropriate years.

Selected Historical and Other Data

Table 10. Nonfarm Sole Proprietorship Returns: Selected Income Statement Items for Income Years, 1999-2005

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

Item	1999	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Number of returns with nonfarm business net income or deficit, total [1]	17,575,643	17,904,731	18,338,190	18,925,517	19,710,079	20,590,691	21,467,566
Number with nonfarm business net income	13,165,318	13,307,842	13,603,907	13,750,798	14,447,889	15,053,252	15,750,475
Number of nonfarm businesses	19,516,047	19,863,507	20,378,335	20,972,642	21,875,950	22,842,859	23,893,733
Business receipts, total	969,347,038	1,020,957,283	1,016,834,678	1,029,691,760	1,050,202,446	1,139,523,760	1,222,880,231
Income from sales and operations	955,392,128	1,007,948,354	1,002,205,953	1,015,363,541	1,033,934,376	1,122,226,857	1,204,827,487
Total deductions [2]	761,427,577	806,386,102	799,633,110	808,900,651	820,206,714	892,402,428	953,391,489
Cost of goods sold	370,079,223	387,381,087	363,355,614	351,785,009	338,376,959	370,951,227	396,875,774
Inventory, beginning-of-year	31,540,485	32,412,471	34,176,255	34,291,721	34,924,642	35,761,115	38,101,650
Inventory, end-of-year	33,835,064	34,342,365	35,732,488	36,279,786	36,911,339	38,955,669	42,024,497
Purchases	255,539,328	268,789,953	246,541,135	227,085,757	218,445,328	238,922,503	252,887,700
Cost of labor	28,723,302	29,278,688	28,022,289	30,389,028	28,032,070	31,768,695	32,163,009
Materials and supplies	41,757,379	43,195,524	43,798,283	45,589,230	46,554,634	53,267,879	55,902,012
Advertising	9,453,659	10,148,700	10,774,079	11,237,979	12,340,084	12,888,316	14,449,493
Car and truck expenses	40,786,963	45,711,214	47,351,940	50,489,359	53,466,645	58,980,274	71,013,061
Commissions	11,228,396	11,621,490	12,130,077	14,066,786	13,502,446	13,267,025	15,439,663
Depletion	387,000	684,974	693,669	461,938	639,008	775,567	1,061,786
Depreciation	30,637,555	32,196,159	33,425,567	36,642,027	41,754,963	42,900,776	39,080,205
Pension and profit-sharing plans	870,362	892,873	991,892	1,085,247	1,182,019	1,202,228	1,251,915
Employee benefit programs	1,663,528	1,871,875	2,040,639	2,284,368	2,421,673	2,617,800	2,798,308
Insurance	13,219,821	13,623,759	14,367,018	16,004,335	17,489,210	18,864,229	19,000,895
Interest paid, total	11,224,488	12,232,846	12,509,547	11,439,539	10,581,245	11,023,766	12,109,510
Mortgage interest	4,736,127	5,250,896	5,456,226	5,006,864	4,762,929	5,167,373	5,543,658
Other interest	6,488,361	6,981,950	7,053,321	6,432,675	5,818,316	5,856,393	6,565,852
Legal and professional services	6,818,392	7,312,694	7,482,619	8,365,930	8,284,557	8,959,140	9,836,870
Meals and entertainment expenses before limitation	7,987,445	9,183,825	9,314,840	10,020,243	10,897,636	11,792,887	[3]
Meals and entertainment deduction	4,031,523	4,664,694	4,735,312	5,088,083	5,524,213	5,997,824	6,802,217
Office expenses	9,921,297	10,456,415	10,604,805	11,331,733	11,849,079	12,362,672	12,835,599
Rent paid, total	31,417,502	33,222,458	33,641,132	34,854,754	35,672,010	36,867,569	39,484,729
On machinery	8,227,000	8,880,267	8,522,008	8,543,257	8,470,304	8,728,363	9,135,688
On other business property	23,190,502	24,342,191	25,119,124	26,311,497	27,201,706	28,139,206	30,349,041
Repairs	11,697,341	12,280,525	12,129,756	12,669,141	13,221,220	14,762,464	14,976,142
Net salaries and wages (not deducted elsewhere)	61,204,430	63,485,540	63,826,020	66,067,965	67,640,849	71,068,517	75,091,154
Supplies	21,654,319	21,793,962	23,074,836	24,615,763	25,507,159	27,302,886	28,858,613
Taxes paid	14,000,359	13,955,919	14,214,082	14,901,431	15,179,639	16,036,234	16,797,524
Travel	8,089,635	8,457,317	8,657,266	9,110,193	9,313,708	10,317,557	11,308,328
Utilities (including telephone)	18,466,170	19,381,881	20,482,680	20,674,727	21,661,093	21,477,462	22,910,257
Bad debts	1,111,178	983,868	1,176,324	1,055,722	[3]	[3]	[3]
Business use of home	4,785,849	5,642,543	5,981,403	6,474,145	7,047,483	7,807,037	8,801,078
Net income (less deficit) [2]	207,946,977	214,715,298	217,385,116	221,113,286	230,308,100	247,567,189	269,919,995
Net income [2]	233,404,991	245,230,626	250,178,322	257,292,855	269,089,168	290,486,159	314,756,510
Deficit [2]	25,458,013	30,515,328	32,793,206	36,179,568	38,781,068	42,918,970	44,836,514

[1] Represents the number of returns, even if there was more than one business per return.

[2] "Total deductions" include amounts not shown separately in this table, as well as amounts not itemized separately on Schedule C-EZ (short form) used by certain of the smaller businesses. Most deductions for which statistics are shown are slightly understated to the extent that only total deductions had to be reported on Schedule C-EZ. Total deductions exclude disallowed "passive losses"; but net income (less deficit), net income, and deficit reflect these losses. In addition, net income (less deficit), net income, and deficit are after adjustment for the passive loss carryover from prior years. Therefore, "business receipts" minus "total deductions" do not equal "net income (less deficit)."

[3] Not available.

NOTES: There are slight differences between: (a) the number of individual income tax returns "with business or profession net income or loss" and the associated amounts, based on the summarized totals on the face of the tax return (Table 1), and (b) the related number of individual income tax returns "with nonfarm business net income or deficit" and the associated amounts, based on data from Schedules C filed in support of the total on the face of the return (Table 10). These differences result from the somewhat larger tax return samples underlying the sole proprietorship statistics for more recent years, and also from the taxpayer reporting variations and inconsistencies, e.g., in the occasional misreporting of farm versus nonfarm business activity on the face of the return compared to what was indicated in supporting schedules, and in the equating of certain partnership income or employee business expenses with the presence of sole proprietorship activity. Detail may not add to totals because of rounding. All amounts are in current dollars. Most of the data are subject to sampling error. Tax law and tax form changes affect the year-to-year comparability of the data.

Selected Historical and Other Data

Table 11. Partnership Returns: Selected Balance Sheet and Income Statement Items for Income Years, 1999-2005

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

Item	1999	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Total number of active partnerships	1,936,919	2,057,500	2,132,117	2,242,169	2,375,375	2,546,877	2,763,625
Number with net income	1,225,916	1,261,420	1,301,040	1,325,008	1,356,988	1,440,895	1,580,266
Number with balance sheets [1]	1,392,405	1,504,978	1,591,450	1,682,072	1,768,302	1,890,134	2,058,001
Number of partners	15,353,154	13,659,967	14,231,604	14,328,108	14,108,458	15,556,553	16,211,908
Number of limited partnerships [2]	354,295	348,973	369,150	376,963	378,921	402,238	413,712
Number of partners [2]	8,944,693	6,468,292	7,023,431	6,918,515	6,262,103	7,023,921	6,946,986
Number of limited liability companies [2]	589,403	718,704	808,692	946,130	1,091,502	1,270,236	1,465,223
Number of partners [2]	2,256,062	2,699,227	3,231,921	3,737,899	4,226,099	4,949,808	5,640,146
Total assets [3]	5,998,952,883	6,694,142,838	8,428,217,379	8,866,560,101	9,675,052,728	11,607,698,140	13,734,256,305
Depreciable assets (net)	1,314,251,428	1,487,182,018	1,646,477,441	1,791,511,841	1,845,514,643	1,988,468,476	2,175,870,104
Inventories, end of year	174,078,288	149,875,359	208,165,141	202,669,386	213,605,408	275,807,149	315,475,201
Land	326,371,562	358,625,577	392,090,094	423,177,429	454,765,198	509,408,430	607,354,512
Total liabilities [3]	3,453,186,389	3,695,508,180	4,835,135,071	4,972,036,919	5,303,160,043	6,247,952,541	7,482,803,211
Accounts payable	243,769,049	229,893,243	361,748,491	346,350,802	275,560,392	336,393,755	400,232,413
Short-term debt [4]	231,808,501	252,226,751	289,248,638	282,684,863	273,570,095	296,350,178	372,521,209
Long-term debt [5]	988,667,751	1,132,180,865	1,286,392,538	1,375,077,274	1,389,224,345	1,545,671,581	1,772,258,856
Nonrecourse loans	582,151,975	639,417,006	699,883,406	770,277,980	799,599,369	854,466,687	913,847,174
Partners' capital account [3]	2,545,766,494	2,998,634,658	3,593,082,308	3,894,523,181	4,371,892,684	5,359,745,599	6,251,453,094
Total receipts [6]	1,907,171,104	2,405,356,195	2,665,156,204	2,772,829,505	2,922,723,256	3,260,264,592	3,862,916,552
Business receipts	1,615,762,245	2,061,764,235	2,278,200,526	2,414,187,093	2,545,612,266	2,818,861,323	3,280,057,196
Interest received	61,769,762	82,322,875	84,801,548	70,225,315	70,702,884	87,942,510	133,742,087
Total deductions [6]	1,678,732,999	2,136,365,436	2,388,821,379	2,502,162,335	2,621,325,038	2,875,561,301	3,316,706,450
Cost of goods sold	902,157,018	1,225,628,897	1,338,114,656	1,430,213,629	1,522,806,503	1,666,146,493	1,975,816,361
Purchases	585,068,938	797,038,243	887,515,286	903,589,600	987,652,150	1,130,541,265	1,328,185,749
Cost of labor	42,089,216	46,714,175	53,029,403	58,736,031	63,434,283	67,483,580	80,010,457
Net salaries and wages (not deducted elsewhere)	169,905,010	201,350,844	230,874,139	237,882,426	244,927,745	268,806,663	293,216,547
Taxes paid	26,896,235	31,145,304	34,626,540	36,416,569	39,019,475	42,114,276	46,896,065
Interest paid	74,428,567	92,751,748	97,278,387	68,127,690	64,619,863	64,457,049	103,453,348
Depreciation [7]	102,786,520	116,040,441	138,412,382	154,542,874	157,411,296	168,496,995	140,468,457
Net income (less deficit)	228,438,105	268,990,758	276,334,824	270,667,169	301,398,218	384,738,394	546,210,103
Net income	348,467,958	409,972,787	446,069,172	439,761,741	468,552,382	566,231,686	723,605,859
Deficit	120,029,853	140,982,029	169,734,347	169,094,572	167,154,164	181,493,292	177,395,756

[1] Certain small partnerships were not required to file balance sheets.

[2] Number of limited partnerships, limited liability companies, and the associated number of partners are understated because some businesses failed to answer the question about type of partnership on their tax returns as originally filed.

[3] Total assets, total liabilities, and partners' capital account represent end-of-year amounts. Moreover, they are understated somewhat because not all partnerships included a complete balance sheet and because of the reporting requirement mentioned in footnote 1, above. However, certain partnerships with negative total assets, total liabilities, and/or total partners' capital are included in the statistics.

[4] Short-term debt is the abbreviated title for mortgages, notes, and bonds payable in less than 1 year.

[5] Long-term debt is the abbreviated title for mortgages, notes, and bonds payable in 1 year or more.

[6] "Total receipts" and "total deductions" include amounts not shown separately. Total receipts were computed for the statistics as the sum of trade or business income (gross receipts or sales less returns and allowances (business receipts); ordinary income from other partnerships, estates, and trusts; farm net profit; net gain, noncapital assets; and other income from trade or business), as well as income distributed directly to partners (net rental real estate income; other net rental income; interest income; dividend income; and royalties). Total deductions were computed as the sum of trade or business expenses (cost of goods sold; ordinary loss from other partnerships; net farm loss; net loss, noncapital assets; other loss from trade or business; and total deductions from trade or business), as well as losses distributed directly to partners (net rental real estate loss; and other net rental loss). Starting in 2004, other portfolio income (loss) was not included in total receipts and deductions because it was no longer reported separately on the tax return. Portfolio net short-term capital gain (loss) and net long-term capital gain (loss) continue to be intentionally omitted from total receipts and total deductions in order to improve comparability with 1986 and prior data.

[7] Represents the more complete amounts reported in depreciation computation schedules, rather than the amounts reported as the depreciation deduction.

NOTES: Detail may not add to totals because of rounding. All amounts are in current dollars. Most of the data are subject to sampling error. Tax law and tax form changes affect the year-to-year comparability of the data.

SOURCE: *Statistics of Income Bulletin*, summer or fall issues (for most years).

Selected Historical and Other Data

Table 12. Number of Business Income Tax Returns, by Size of Business for Income Years, 1999-2005 [1]

[All figures are estimates based on samples—number of businesses is in thousands]

Type and size of business	1999	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
CORPORATIONS							
Total	4,935.9	5,045.3	5,135.6	5,266.6	5,401.2	5,557.9	5,671.3
Receipt size [2]							
Under \$25,000 [3]	1,188.7	1,220.0	1,248.2	1,282.5	1,279.7	1,316.9	1,299.7
\$25,000 under \$50,000	296.9	305.4	295.8	314.3	346.3	334.5	340.3
\$50,000 under \$100,000	486.5	477.4	484.5	514.4	522.1	545.2	543.7
\$100,000 under \$250,000	823.9	837.1	877.1	893.9	929.9	971.8	997.3
\$250,000 under \$500,000	676.1	677.5	672.6	688.8	719.6	731.5	757.8
\$500,000 under \$1,000,000	546.2	581.9	601.5	610.7	622.6	634.5	644.2
\$1,000,000 or more	917.5	946.0	955.9	962.1	981.1	1,023.4	1,088.3
Asset size [4]							
Under \$100,000 [5]	2,845.7	2,911.3	n.a.	n.a.	n.a.	n.a.	n.a.
Under \$500,000 [5]	n.a.	n.a.	4,289.8	4,415.3	4,544.5	[r] 4,668.0	4,736.9
\$100,000 under \$1,000,000	1,600.2	1,631.0	n.a.	n.a.	n.a.	n.a.	n.a.
\$500,000 under \$1,000,000	n.a.	n.a.	342.2	344.5	342.8	356.1	370.6
\$1,000,000 under \$10,000,000	413.3	422.5	424.0	427.1	432.3	447.8	472.8
\$10,000,000 under \$25,000,000	35.0	37.0	36.4	36.8	37.7	39.9	42.7
\$25,000,000 under \$50,000,000	13.6	14.4	14.1	13.9	14.1	15.0	15.8
\$50,000,000 under \$100,000,000	9.3	9.6	9.5	9.3	9.3	9.5	9.9
\$100,000,000 under \$250,000,000	8.4	8.7	8.7	8.6	8.7	8.9	9.3
\$250,000,000 or more, total	10.4	10.9	11.0	11.1	11.8	12.3	13.2
\$250,000,000 under \$500,000,000	n.a.	n.a.	4.2	4.2	4.4	4.6	4.8
\$500,000,000 under \$2,500,000,000	n.a.	n.a.	4.9	4.9	5.3	5.6	6.0
\$2,500,000,000 or more	n.a.	n.a.	1.9	2.0	2.1	2.1	2.4
PARTNERSHIPS							
Total	1,936.9	2,057.5	2,132.1	2,242.2	2,375.4	2,546.9	2,763.6
Receipt size [6]							
Under \$25,000 [3]	1,036.3	1,105.1	1,129.9	1,203.7	1,284.4	1,372.9	1,465.2
\$25,000 under \$50,000	169.5	183.0	182.6	185.3	191.8	193.2	218.4
\$50,000 under \$100,000	187.4	187.3	192.1	195.1	205.7	225.8	232.8
\$100,000 under \$250,000	212.4	225.8	233.9	248.5	262.4	275.5	307.2
\$250,000 under \$500,000	125.8	127.0	139.4	145.3	147.9	160.9	182.0
\$500,000 under \$1,000,000	83.8	92.4	102.8	105.0	110.7	120.8	130.6
\$1,000,000 or more	121.6	136.9	151.4	159.3	172.4	197.9	227.3
Asset size							
Under \$25,000 [5]	793.3	827.9	825.5	865.5	925.9	982.4	1,045.6
\$25,000 under \$50,000	93.3	105.3	104.7	104.9	112.0	108.6	103.4
\$50,000 under \$100,000	135.4	128.4	130.7	132.7	131.9	134.8	150.5
\$100,000 under \$250,000	216.4	229.5	239.1	252.3	259.0	278.6	303.0
\$250,000 under \$500,000	175.8	196.5	205.9	205.5	227.7	248.1	269.4
\$500,000 under \$1,000,000	175.2	183.0	202.6	226.4	231.7	249.6	279.6
\$1,000,000 or more	347.5	386.9	423.7	454.9	487.2	544.8	612.1

Footnotes at end of table.

Selected Historical and Other Data

Table 12. Number of Business Income Tax Returns, by Size of Business for Income Years, 1999-2005 [1]—Continued

[All figures are estimates based on samples—number of businesses is in thousands]

Type and size of business	1999	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
NONFARM SOLE PROPRIETORSHIPS [7]							
Total	17,575.6	17,904.7	18,338.2	18,925.5	19,710.1	20,590.7	21,467.6
Receipt size							
Under \$2,500 [3]	4,295.6	4,333.1	3,769.4	[r] 4,546.4	4,539.7	4,883.5	5,069.4
\$2,500 under \$5,000	1,972.6	1,933.9	1,989.3	2,043.8	2,233.0	2,219.6	2,372.8
\$5,000 under \$10,000	2,350.2	2,395.7	2,523.1	2,604.6	2,816.3	2,916.0	2,967.1
\$10,000 under \$25,000	3,202.2	3,334.0	3,448.4	3,521.6	3,719.1	3,896.7	4,047.0
\$25,000 under \$50,000	2,227.0	2,246.7	2,239.3	2,357.8	2,449.8	2,536.4	2,587.4
\$50,000 under \$100,000	1,558.5	1,644.8	1,704.0	1,751.8	1,805.4	1,791.6	1,980.7
\$100,000 under \$200,000	1,020.3	1,052.9	1,109.7	1,115.4	1,145.7	1,270.8	1,281.9
\$200,000 under \$500,000	681.4	680.4	649.2	687.8	705.1	749.2	809.4
\$500,000 under \$1,000,000	182.2	189.5	197.8	203.3	199.7	217.6	234.5
\$1,000,000 or more	85.7	91.7	92.9	93.0	96.3	109.3	117.3

n.a. - Not available.

[r] Revised or corrected.

[1] Excludes business income tax returns filed by tax-exempt organizations. See Table 16.

[2] Size classes for corporations are based on "business receipts," i.e., gross amounts from sales and operations, except for industries in the "finance and insurance" industrial sector and those in the "management of companies (holding companies)" sector (which includes bank holding companies, as well as other holding companies). For the groupings, "total receipts," which are the sum of business receipts and investment income, were used instead of "business receipts" as the basis for the size classification.

[3] Includes returns with no "business receipts" (or no "total receipts" in the case of certain corporations as described in footnote 2).

[4] Beginning Tax Year 2001, size of assets of under \$500,000 and \$500,000 under \$1,000,000 replaced size of assets of under \$100,000 and \$100,000 under \$1,000,000 of earlier years. Also, size of assets of \$250,000,000 under \$500,000,000; \$500,000,000 under \$2,500,000,000; and \$2,500,000,000 or more are shown beginning with Tax Year 2001.

[5] Includes corporations and partnerships with "zero assets and liabilities." For corporations, returns with zero assets represent final returns of liquidating or dissolving corporations which had disposed of all assets; final returns of merging corporations whose assets were included in the returns of the acquiring corporations; part-year returns of corporations changing accounting periods (except for certain newly-incorporated businesses); and returns of foreign corporations with income "effectively connected" with a U.S. business (except foreign insurance companies providing separate balance sheets for U.S. branches). For partnerships, returns with zero assets include final returns of liquidating or dissolving partnerships which had disposed of all assets and businesses not required to file balance sheets, as well as businesses that failed to provide balance sheets on their returns as originally filed. See also Table 11, footnote 1.

[6] Size classes for partnerships are affected by changes in the definition of receipts. (See Table 11, footnote 6.)

[7] Sole proprietors are not required to provide balance sheet information.

NOTES: Statistics for corporations are for accounting periods ending July of one year through June of the next. Thus, for example, corporation data for 2004 are for accounting periods ending July 2004 through June 2005. Statistics for nonfarm sole proprietorships and partnerships are, in general, for the calendar year. Data may not add to totals because of rounding. Most of the data are subject to sampling errors. Tax law and tax form changes affect the year-to-year comparability of the data.

Selected Historical and Other Data

Table 13. Corporation Income Tax Returns: Balance Sheet, Income Statement, and Tax Items for Income Years, 1999-2005

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

Item	1999	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Number of returns, total [1]	4,935,904	5,045,274	5,135,591	5,266,607	5,401,237	5,557,965	5,671,257
Number with net income [1]	2,812,175	2,819,153	2,822,302	2,800,517	2,932,115	3,116,468	3,324,260
Consolidated returns [1,2,3]	57,144	56,603	56,507	52,743	49,900	48,066	46,328
S corporation returns [1,3,4]	2,725,775	2,860,478	2,986,486	3,154,377	3,341,606	3,518,334	3,684,086
Total assets [5]	41,464,152,854	47,026,871,874	49,154,424,202	50,413,501,942	53,644,784,683	60,117,759,331	66,445,429,787
Cash	1,596,525,490	1,819,788,484	1,926,059,284	1,923,414,875	2,119,555,828	2,730,468,320	2,823,419,976
Notes and accounts receivable	7,744,960,605	8,754,425,366	8,755,544,213	8,885,603,717	8,995,395,904	10,690,858,849	11,962,100,582
Less: Allowance for bad debts	139,597,391	148,289,201	180,317,404	184,924,054	166,436,901	166,296,012	170,466,986
Inventories [6]	1,198,184,825	1,271,967,443	1,208,206,944	1,221,112,550	1,267,289,489	1,386,128,237	1,505,452,196
Investments in U.S. Government obligations	1,340,484,175	1,236,229,842	1,392,035,604	1,527,139,020	1,656,326,948	1,571,309,466	1,613,373,550
Tax-exempt securities [7]	957,099,790	973,317,816	1,057,398,071	1,203,096,628	1,297,278,783	1,366,224,245	1,468,019,062
Other current assets	2,639,764,762	3,206,693,449	3,663,607,042	3,509,562,061	3,868,061,886	4,449,284,482	5,309,202,111
Loans to shareholders	126,016,307	157,029,888	189,958,748	194,543,759	212,364,720	183,667,567	445,244,680
Mortgage and real estate loans	2,554,658,266	2,821,508,159	3,228,970,528	3,687,181,263	4,072,938,126	4,626,579,648	4,776,955,204
Other investments	15,799,039,436	17,873,853,425	18,343,524,687	18,727,600,926	20,535,952,107	22,657,060,564	25,161,629,498
Depreciable assets	6,935,503,013	7,291,998,758	7,613,590,480	7,677,626,201	7,804,548,186	7,973,940,602	8,415,761,105
Less: Accumulated depreciation	3,227,243,753	3,369,214,883	3,549,239,594	3,699,383,948	3,812,960,901	3,930,550,044	4,096,350,302
Depletable assets	183,593,413	191,353,340	198,775,908	226,336,112	237,004,322	269,600,908	310,219,056
Less: Accumulated depletion	85,660,310	87,437,339	92,093,245	110,296,199	110,386,244	116,413,985	128,373,491
Land	286,497,086	302,831,910	319,953,637	325,689,411	341,705,785	362,615,279	406,830,196
Intangible assets (amortizable)	1,717,251,430	2,246,509,413	2,474,758,111	2,353,465,751	2,421,707,223	2,772,388,173	3,055,303,170
Less: Accumulated amortization	280,555,798	364,363,888	483,180,189	480,835,477	478,750,745	508,581,335	532,450,560
Other assets	2,117,631,510	2,848,669,891	3,086,871,379	3,426,569,347	3,383,190,167	3,799,474,366	4,119,560,739
Total liabilities [5]	41,464,152,854	47,026,871,874	49,154,424,202	50,413,501,942	53,644,784,683	60,117,759,331	66,445,429,787
Accounts payable [8]	2,792,333,967	3,758,177,869	3,927,350,604	4,073,664,265	4,337,572,143	5,645,442,995	6,028,618,202
Mortgages, notes, and bonds payable in less than 1 year	3,658,308,770	4,019,704,844	4,131,856,961	3,814,481,517	4,001,969,180	4,398,614,808	4,192,065,342
Other current liabilities [8]	9,103,186,192	10,307,362,766	10,811,930,775	11,181,118,658	11,808,860,907	13,534,418,924	16,510,644,978
Loans from shareholders	394,938,632	451,461,831	549,016,868	541,170,351	531,953,102	504,947,743	543,624,853
Mortgages, notes, and bonds payable in 1 year or more	5,448,156,416	6,183,999,343	6,781,681,427	7,184,589,809	7,383,799,418	8,154,008,233	8,331,501,033
Other liabilities	4,704,367,882	4,957,514,852	5,337,844,395	6,073,368,168	6,761,943,361	7,065,958,007	7,314,067,770
Net worth	15,362,860,996	17,348,650,369	17,614,743,174	17,545,109,175	18,818,686,574	20,814,368,622	23,524,907,609
Capital stock	3,521,992,715	3,966,282,789	4,253,450,013	3,999,980,176	3,150,571,907	2,308,398,504	2,482,284,753
Additional paid-in capital	10,186,395,658	12,264,818,660	13,919,963,504	15,286,648,711	15,258,444,856	16,160,039,808	17,828,299,850
Retained earnings, appropriated	210,792,152	181,838,405	140,283,315	116,673,731	167,723,931	218,699,183	242,693,805
Retained earnings, unappropriated [9]	3,741,892,919	3,445,346,327	2,024,731,460	1,060,109,067	2,141,352,269	3,058,994,776	4,088,766,169
Adjustments to shareholders' equity [9]	17,108,266	-3,382,272	-33,277,666	-66,214,884	-27,510,760	-21,710,161	-42,269,533
Less: Cost of treasury stock	2,315,320,710	2,506,253,537	2,690,407,452	2,852,087,624	1,871,895,626	931,763,649	1,117,136,968
Total receipts [10]	18,892,385,694	20,605,808,071	20,272,957,624	19,749,426,052	20,689,574,291	22,711,863,939	25,504,789,203
Business receipts [10,11]	16,313,971,385	17,636,551,349	17,504,288,630	17,297,125,146	18,264,393,898	19,975,875,761	21,800,290,496
Interest on State and local government obligations	51,780,203	51,940,598	49,227,853	48,212,626	48,996,780	47,221,454	61,174,727
Other interest [10,12]	1,301,772,282	1,576,100,843	1,499,683,236	1,233,298,115	1,132,675,179	1,337,625,869	1,712,270,625
Dividends received from domestic corporations [10,12]	20,679,644	20,869,880	18,964,132	17,382,452	17,973,872	19,505,243	21,401,252
Dividends received from foreign corporations [10]	64,905,407	60,203,391	49,997,670	45,580,553	44,921,527	58,411,038	362,945,282
Rents [10]	117,644,823	131,301,498	134,013,856	136,156,000	136,321,392	132,058,314	136,067,022
Royalties [10]	105,741,540	122,513,266	116,989,820	115,860,138	133,184,522	141,999,230	153,609,706
Net short-term capital gain reduced by net long-term capital loss	94,913,405	85,003,779	20,770,292	14,655,834	22,725,799	24,993,598	38,685,662
Net long-term capital gain reduced by net short-term capital loss	146,520,147	173,758,106	117,443,499	76,266,064	85,965,872	110,055,554	161,699,988
Net gain, noncapital assets [11]	64,698,446	70,035,992	61,890,648	69,144,256	76,272,207	81,501,337	78,271,268
Other receipts	609,758,412	677,529,368	699,687,988	695,744,869	726,143,243	782,616,541	978,373,175

Footnotes at end of table.

Selected Historical and Other Data

Table 13. Corporation Income Tax Returns: Balance Sheet, Income Statement, and Tax Items for Income Years, 1999-2005—Continued

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

Item	1999	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Total deductions [10]	17,966,972,060	19,691,591,726	19,682,982,949	19,198,882,118	19,940,594,557	21,636,155,758	23,612,765,507
Cost of goods sold [10]	10,284,098,039	11,135,287,909	11,041,533,030	10,607,404,004	11,318,644,763	12,497,904,654	13,816,464,452
Compensation of officers [10]	373,735,141	401,416,310	382,813,379	381,235,331	388,661,740	416,761,257	444,974,385
Repairs	133,209,853	139,591,861	144,239,688	132,998,715	134,963,543	142,843,894	154,331,486
Bad debts [10]	100,202,508	107,679,638	142,196,860	168,045,866	151,140,752	139,664,267	119,041,270
Rent paid on business property [10]	347,245,365	380,083,953	398,045,240	410,639,197	407,139,494	419,657,325	438,512,225
Taxes paid [10]	371,183,229	390,067,116	392,458,476	396,571,738	416,812,815	446,793,685	472,952,167
Interest paid [10]	1,018,972,484	1,271,678,744	1,203,045,923	912,751,562	818,016,806	938,790,256	1,287,097,591
Contributions or gifts [10]	10,732,153	10,657,214	11,414,505	10,334,666	10,823,373	11,596,559	16,594,361
Amortization [10]	86,124,690	98,333,079	110,454,488	115,006,680	121,284,821	129,766,141	140,874,992
Depreciation [10]	583,799,587	614,372,700	649,988,724	710,881,312	692,432,495	690,857,316	530,931,029
Depletion [10, 13]	9,803,284	10,244,959	9,803,354	9,418,123	10,170,908	11,960,564	15,421,478
Advertising [10]	216,066,879	234,000,558	219,834,114	218,035,603	224,790,471	238,662,306	253,187,675
Pension, profit-sharing, stock bonus, and annuity plans [13]	76,779,560	85,788,656	85,523,682	132,414,263	137,053,065	149,061,713	146,824,063
Employee benefit programs [13]	203,531,897	231,325,484	245,747,438	249,904,744	277,325,261	298,070,744	303,141,008
Net loss, noncapital assets [10, 11]	29,065,260	31,314,500	40,969,394	51,879,801	51,799,134	42,751,870	38,000,708
Other deductions [13]	4,122,422,135	4,549,749,050	4,604,914,658	4,691,360,514	4,779,535,119	5,061,013,207	3,097,414,783
Total receipts less total deductions [10, 14]	925,413,634	914,216,344	589,974,675	550,543,934	748,979,734	1,075,708,181	1,892,023,696
Constructive taxable income from related foreign corporations [15]	55,322,097	65,249,771	62,876,530	61,325,249	80,005,681	83,205,831	117,806,164
Net income (less deficit) [10, 14, 15, 16]	928,955,528	927,525,517	603,623,352	563,656,558	779,988,635	1,111,692,655	1,948,655,133
Net income [16]	1,229,295,911	1,336,619,605	1,112,480,550	1,053,126,217	1,175,608,990	1,455,796,796	2,234,882,109
Deficit [16]	300,340,383	409,094,088	508,857,198	489,469,660	395,620,355	344,104,141	286,226,977
Income subject to tax: [17]							
Number of returns	868,820	828,470	780,223	696,230	660,582	664,616	698,546
Amount	693,735,694	760,404,334	635,257,416	600,553,517	699,336,915	857,391,889	1,201,325,339
Total income tax [18]	241,987,588	266,281,801	220,874,245	209,691,130	243,822,946	299,555,304	419,209,279
Regular tax [19]	238,722,344	262,232,738	218,675,610	207,056,104	241,275,165	296,200,379	416,324,111
Recapture of prior-year investment credit	8,754	9,594	20,924	9,189	10,740	9,557	7,174
Alternative minimum tax: [20]							
Number of returns	14,901	13,135	7,101	7,066	9,564	10,648	13,619
Amount	3,051,869	3,874,845	1,800,595	2,532,224	2,298,776	3,438,545	3,339,891
Tax credits: [21]							
Total	48,959,947	62,238,013	54,162,256	56,078,260	66,305,542	75,119,947	107,128,815
Foreign tax credit: [22]							
Number of returns	5,864	5,937	5,488	4,726	5,414	5,500	6,016
Amount	38,389,989	48,505,841	41,063,165	42,021,526	50,033,590	56,872,180	82,051,187
U.S. possessions tax credit [22]	1,485,261	1,438,549	1,268,616	1,191,217	1,081,674	941,968	883,735
Nonconventional source fuel credit	886,835	1,516,990	1,806,406	2,189,943	2,104,097	2,725,372	3,418,404
Qualified electric vehicle credit	1,191	1,246	231	6,102	N/A	N/A	N/A
Qualified zone academy bond credit	2,170	14,542	28,151	80,289	103,058	117,895	135,121
Prior-year minimum tax credit	3,431,478	5,169,159	3,254,175	2,027,542	3,355,062	3,737,618	7,134,874
General business credit	4,763,022	5,591,686	6,741,513	8,561,641	9,627,908	10,724,914	13,499,478
Empowerment zone employment credit	21,645	23,501	23,401	59,776	92,900	113,778	155,144
General business current year							
credit items: [23]							
Investment credit	315,225	357,607	359,179	449,893	418,904	436,833	495,182
Work opportunity credit/jobs credit	253,886	266,341	233,563	258,428	273,875	304,039	448,720
Alcohol fuel credit	15,817	11,825	9,224	8,467	8,112	11,843	9,271
Research activities credit	5,410,932	7,235,621	6,518,136	5,818,383	5,659,746	5,764,898	6,642,687
Orphan drug credit	109,435	112,954	134,846	146,900	173,848	209,488	232,185
Total income tax after credits [24]	193,027,641	204,043,788	166,711,988	153,612,870	177,517,404	[r] 224,435,343	312,086,477

Footnotes at end of table.

Selected Historical and Other Data

Table 13. Corporation Income Tax Returns: Balance Sheet, Income Statement, and Tax Items for Income Years, 1999-2005—Continued

Footnotes

N/A—Not applicable.

[r] Revised.

[1] Excludes inactive corporation returns. Excludes taxable farmers' cooperatives; Real Estate Mortgage Investment Conduits (REMICs); Foreign Sales Corporations (FSCs) and Interest-Charge Domestic International Sales Corporations (IC-DISCs). Because of the omission of these categories of returns, annual totals for the income, financial, and tax items shown in the statistics (except those not applicable to IC-DISCs and FSCs, such as "income subject to tax," "income tax," and tax credits) are not altogether comparable. Corporations that otherwise qualified as S corporations, but that had subsidiaries, could qualify provided the subsidiaries also qualified as S corporations. These subsidiaries, which filed separate returns prior to 1987, are included in the income tax returns of the parent S corporations. S corporation net income totals for receipts and deductions are slightly understated to the extent that they are not directly related to the "income from a trade or business" reported by these companies and by the exclusion of certain amounts for Regulated Investment Companies.

[2] Consolidated returns were filed on an elective basis for groups of affiliated corporations (with exceptions), in general, if 80 percent or more of the stock of the affiliates was owned within the group, and a common parent corporation owned at least 80 percent of the stock of at least one of the affiliates. Consolidated returns exclude S corporations (defined in footnote 4), although, starting with 1997, S corporation returns could include subsidiaries that were also S corporations. Returns filed by parent S corporations which include qualifying subsidiaries are included in the S corporation frequencies shown below in Table 13. Consolidated returns also exclude all real estate investment trusts (REITs).

[3] Included in "number of returns, total" and "number with net income."

[4] In general, certain small qualifying corporations that elected to be taxed at the shareholder level. These corporations could have no more than 75 shareholders (mostly individuals). S corporation returns could include subsidiaries if the subsidiaries also qualified as S corporations, with income and financial data for both parent and subsidiaries combined on the return of the parent corporation.

[5] Balance sheet data are end-of-year amounts.

[6] Inventories include amounts reported by real estate subdividers and developers.

[7] Tax-exempt securities include not only investments in State and local government obligations, but also stock in investment companies that distributed dividends during the current year representing tax-exempt interest on such obligations.

[8] Accounts payable of banking and savings and loan institutions could include deposits and withdrawable shares, reported in "other current liabilities" prior to 1991.

[9] Starting with 1998, amounts for "adjustments to shareholders' equity" are reported separately on the tax return.

[10] In general, Statistics of Income data for receipts, deductions, and net income (or deficit) of S corporations are limited to those attributable to a trade or business. Therefore, most investment income or loss, such as from taxable interest, dividends, rents, royalties, and gain (loss) from sales of investment property; the deductions related to this income; and deductions for charitable contributions, intangible drilling and development costs, oil and gas depletion, foreign taxes paid, and the limited expensing of the cost of depreciable assets (Code section 179) are not reflected in net income (because they were allocated directly to shareholders instead). See also footnote 4.

Cost of goods sold applies when inventories are an income-determining factor, i.e., when the corporation was engaged in the production, manufacture, purchase, or sale of merchandise in the course of the trade or business. For all years, identifiable amounts of depreciation, depletion, amortization, taxes paid, advertising, bad debts, compensation of officers, employee plan contributions, interest paid, and rent found in taxpayer schedules in support of the total cost of goods sold/cost were transferred to their respective deduction headings for the statistics. This enabled more complete statistics for these expenditures to be produced.

[11] "Business receipts" include the gross proceeds (netting during statistical processing against the cost of these sales) reported by stock and commodity brokers and exchanges, and by real estate subdividers, developers, and operative builders, even when they bought and sold securities, commodities, and real estate on their own account.

[12] "Other interest" includes any dividends reported in combination with interest on Form 1120S by S corporations, i.e., certain corporations that elect to be taxed through shareholders (see footnote 4).

[13] Identifiable amounts reported on Form 1120-A are included in the statistics for the appropriate deduction. Starting with 1992, "other deductions" include certain amounts previously treated as part of the combined "cost of goods sold/cost of operations" for Statistics of Income. See also footnote 10.

[14] In general, "total receipts less total deductions" include tax-exempt interest on State and local government obligations, but exclude income from related foreign corporations only "constructively" received. As such, "total receipts less total deductions" represent all income, taxable and nontaxable, "actually" received by the corporation, as reported on the corporation income tax return, and exclude all income only "constructively" or "deemed" received. In contrast, "net income (less deficit)" represents all taxable income, actually or constructively received. Therefore, in the statistics, "total receipts less total deductions" minus "nontaxable interest on State and local government obligations" plus "constructive taxable income from related foreign corporations" equal "net income (less deficit)." For the exception, due to Regulated Investment Companies, see footnote 16.

[15] Represents "income" that was only "constructively" or "deemed" received from foreign corporations and that was taxed to the U. S. corporation. (In general, such income was otherwise subject to U. S. income tax only when actually repatriated as dividends.) For the statistics, it is the sum of "includable income of Controlled Foreign Corporations" and the "foreign dividend gross-up," reported separately on the tax return. The "includable income" was comprised of specific types of undistributed income earned by a Controlled Foreign Corporation that were taxed under certain conditions to the U. S. shareholder corporations unless an actual "minimum distribution" was made. The foreign dividend gross-up represents a share of the foreign taxes paid on the profits of certain foreign subsidiaries out of which they paid dividends to their U. S. parent corporations and for which the parent corporation then claimed a foreign tax credit.

[16] "Net income (less deficit)," "net income," and "deficit" exclude: (a) net long-term capital gain reduced by net short-term capital loss reported by Regulated Investment Companies (see footnote 14), and (b) amounts other than from a trade or business, i.e., portfolio and rental income, reported by S corporations (see footnote 4).

For additional information about S corporation net income, see the various articles on S corporations in the *Bulletin*, starting with 1990.

Selected Historical and Other Data

Table 13. Corporation Income Tax Returns: Balance Sheet, Income Statement, and Tax Items for Income Years, 1999-2005—Continued

Footnotes—Continued

[17] For most years, "income subject to tax" (the corporate tax base) exceeds "net income (less deficit)" in the statistics, chiefly because of the deficits reported on returns without net income. Moreover, it is the sum of the several tax bases applicable over time to different classes of corporations, not all of which were directly related to net income. Income subject to tax thus includes the "taxable income" base used by most companies (and defined for the statistics as net income minus certain statutory special nonbusiness deductions, such as for intercorporate dividends received and "net operating losses" carried forward from prior years). Profits of S corporations were mostly taxed through shareholders (who had to be individuals, estates, or trusts).

[18] Includes Personal Holding Company tax; tax on "branch profits" of foreign corporations with U.S. operations; and certain lesser taxes, including special taxes applicable to Real Estate Investment Trusts (REITs) and foreign corporations with U.S.-source income. Starting with the statistics shown for 1990, total income tax includes an environmental excise tax reported on the corporation income tax return and collected as part of the corporation income tax. This tax was repealed, effective during 1996. "Total income tax" more closely represents worldwide income tax liability because it is before subtraction of the foreign tax credit, the largest of the tax credits. To the extent that foreign tax credits adequately reflect the total foreign income tax burden, total income tax includes these taxes. See also footnotes 19, 21, and 24.

[19] Different tax rate structures applied for 1990-1992 and 1993-2003.

[20] Under AMT, corporations are required to compute their regular tax liabilities and their "tentative minimum tax" liabilities. The difference between the "tentative minimum tax" and the regular tax is the legally defined alternative minimum tax. The AMT was designed to ensure that, at least, a minimum amount of income tax was paid in spite of the legitimate use of exclusions, deductions, and credits. The tax computation formula was modified in 1990. For tax years beginning after 1997, new corporations and certain small corporations were not subject to the AMT.

[21] Tax credits are applied against "regular tax" only. See also footnote 22.

[22] In publications prior to fall 2003, data in this table for foreign tax credit for 1990, 1995, and 1998, and for U.S. possessions credit for 1995, were revised, based on results of special studies. Subsequently, the data have been restored to their original values to be consistent with published corporate data and to be comparable with data for 1999-2003.

[23] Not all components of the general business credit are shown separately. Most components are subject to a combined overall limitation. Therefore the amounts shown in the table are tentative. Certain credits are subject to a separate limitation.

For other changes in the definition of components of the general business credit, see Statistics of Income—Corporation Income Tax Returns, for the years concerned.

[24] "Total income tax after credits" is before any examination or enforcement activities by the Internal Revenue Service. It is the amount payable to the U.S. Government as reported on the income tax return. Because it is after subtraction of foreign tax credit, this total does not include income taxes paid to foreign governments. In publications prior to fall 2003, amount shown for 1990, 1995, and 1998 had been revised because of revisions to the foreign tax credit (for each of these years) and to the U.S. possessions credit (for 1995) based on special studies. Subsequently, the data have been restored to their original values to be consistent with published corporate data and to be comparable with data for 1999-2003.

NOTES: Statistics are for corporate accounting periods ending July of one year through June of the next. Thus, for example, data for 2005 are for accounting periods ending July 2005 through June 2006. Detail may not add to totals because of rounding. All amounts are in current dollars. Most of the data are subject to sampling error. Tax law and tax form changes

Selected Historical and Other Data

Table 14a. Corporation Income Tax Returns: Selected Balance Sheet, Income Statement, and Tax Items, by Standard Industrial Classification (SIC) Industrial Division, Specified Income Years, 1985-1997

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

Industrial division and item	1985	1990	1995	1996	1997
	(1)	(2)	(3)	(4)	(5)
ALL INDUSTRIAL DIVISIONS [1]					
Number of returns, total [2]	3,277,219	3,716,650	4,474,167	4,631,370	4,710,083
Number with net income [2]	1,820,120	1,910,670	2,455,492	2,588,424	2,647,474
Total assets [3]	12,773,093,888	18,190,057,609	26,013,689,001	28,642,263,127	33,029,652,126
Net worth [3]	3,303,698,576	4,738,917,553	8,131,941,003	9,495,226,103	11,353,013,694
Total receipts [4]	8,398,278,426	11,409,520,074	14,539,050,114	15,525,718,006	16,609,707,302
Business receipts [4,5]	7,369,538,953	9,860,441,633	12,785,797,708	13,659,470,309	14,460,928,695
Interest received [4,6]	637,786,939	977,402,674	1,039,496,772	1,082,071,703	1,186,893,564
Total deductions [4]	8,158,144,126	11,032,574,630	13,821,277,581	14,728,089,018	15,704,242,236
Cost of goods sold [4]	4,894,254,081	6,610,769,883	8,206,073,365	8,707,100,240	9,114,245,646
Interest paid	568,645,475	825,372,164	744,764,676	770,885,334	866,474,183
Net income (less deficit) [4]	240,119,020	370,632,632	714,193,371	806,484,990	915,396,637
Net income [4]	363,867,384	552,526,789	880,653,345	986,782,683	1,117,825,239
Deficit [4]	123,748,365	181,894,157	166,459,975	180,297,692	202,428,602
Total income tax [7]	111,340,839	128,185,666	198,786,648	223,712,985	239,394,206
Regular and alternative tax [8]	109,106,358	119,434,430	193,564,219	219,756,610	235,325,362
Total income tax after credits	63,348,204	96,403,099	156,392,780	170,620,945	184,175,993
AGRICULTURE, FORESTRY, AND FISHING [1]					
Number of returns, total [2]	103,156	126,423	147,527	158,963	163,114
Number with net income [2]	52,776	70,965	79,320	90,012	91,984
Total assets [3]	52,651,197	68,338,381	86,298,574	94,140,118	91,984,030
Net worth [3]	15,406,221	23,360,455	30,102,131	32,757,173	32,990,807
Total receipts [4]	70,491,486	88,101,065	107,581,973	119,737,058	117,387,555
Business receipts [4]	65,419,402	82,114,836	100,630,952	111,727,224	107,930,422
Interest received [4,6]	775,383	681,127	640,032	759,958	601,918
Total deductions [4]	70,559,478	86,883,128	105,967,360	117,166,334	114,673,629
Cost of goods sold [4]	45,085,526	52,758,720	56,765,231	63,581,911	60,245,509
Interest paid	2,758,952	2,852,242	2,892,302	3,008,936	2,978,589
Net income (less deficit) [4]	-74,270	1,156,269	1,604,481	2,614,131	2,673,835
Net income [4]	2,930,905	4,328,433	5,402,335	6,262,057	6,310,262
Deficit [4]	3,005,175	3,172,164	3,797,857	3,647,926	3,636,427
Total income tax [7]	540,641	589,866	661,579	764,345	659,642
Regular and alternative tax [8]	531,787	569,812	640,696	748,862	647,752
Total income tax after credits	344,626	554,818	611,254	659,991	599,082
MINING [1]					
Number of returns, total [2]	41,426	39,674	35,123	35,799	32,996
Number with net income [2]	18,031	18,436	18,776	18,098	17,281
Total assets [3]	240,815,996	219,197,640	268,690,014	299,106,231	324,294,826
Net worth [3]	104,772,797	110,339,579	132,123,209	151,720,805	165,095,652
Total receipts [4]	142,038,595	111,444,457	126,760,491	141,278,092	150,318,265
Business receipts [4]	126,710,610	97,321,579	114,163,493	127,583,639	134,379,404
Interest received [4,6]	3,584,890	3,849,674	2,985,957	3,096,278	3,708,511
Total deductions [4]	145,389,514	106,466,509	121,397,443	133,385,823	141,046,419
Cost of goods sold [4]	87,972,035	62,070,361	70,550,767	78,022,883	78,465,626
Interest paid	7,789,995	6,674,114	6,071,863	6,179,872	6,768,047
Net income (less deficit) [4]	-2,543,487	5,302,223	5,530,975	8,152,607	9,728,562
Net income [4]	6,166,623	9,071,733	9,364,612	12,112,260	14,191,366
Deficit [4]	8,710,110	3,769,511	3,833,637	3,959,653	4,462,804
Total income tax [7]	1,810,559	2,223,977	2,119,370	2,525,467	3,141,128
Regular and alternative tax [8]	1,736,952	1,897,245	1,900,482	2,348,394	2,951,254
Total income tax after credits	557,519	1,348,333	1,170,119	1,350,676	2,019,716

Footnotes at end of table.

Selected Historical and Other Data

Table 14a. Corporation Income Tax Returns: Selected Balance Sheet, Income Statement, and Tax Items, by Standard Industrial Classification (SIC) Industrial Division, Specified Income Years, 1985-1997—Continued

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

Industrial division and item	1985	1990	1995	1996	1997
	(1)	(2)	(3)	(4)	(5)
CONSTRUCTION [1]					
Number of returns, total [2]	318,276	406,874	449,882	471,230	487,783
Number with net income [2]	185,613	223,434	275,375	300,890	307,733
Total assets [3]	215,297,771	243,829,026	265,812,616	284,595,206	314,551,349
Net worth [3]	54,687,270	63,865,550	86,553,081	92,427,338	99,144,660
Total receipts [4]	387,232,953	534,654,044	637,090,195	710,467,223	779,014,473
Business receipts [4]	374,590,273	522,586,199	627,463,416	699,596,890	768,122,399
Interest received [4,6]	3,851,628	3,621,561	2,068,327	2,089,412	2,079,884
Total deductions [4]	382,823,113	527,800,795	622,621,984	692,581,515	758,429,123
Cost of goods sold [4]	295,803,244	407,448,745	483,881,784	537,067,796	589,184,488
Interest paid	6,407,652	7,368,430	5,280,750	5,473,796	5,949,039
Net income (less deficit) [4]	4,370,924	6,824,608	14,458,024	17,878,460	20,522,439
Net income [4]	11,053,145	15,859,977	20,986,981	25,036,702	27,816,466
Deficit [4]	6,682,220	9,035,370	6,528,956	7,158,242	7,294,027
Total income tax [7]	2,312,856	2,092,196	2,462,222	2,958,069	2,953,440
Regular and alternative tax [8]	2,243,786	1,983,902	2,358,661	2,847,146	2,846,960
Total income tax after credits	1,662,563	1,906,537	2,281,929	2,667,923	2,817,961
MANUFACTURING [1]					
Number of returns, total [2]	276,545	301,669	319,699	325,689	325,045
Number with net income [2]	159,778	167,509	185,590	191,254	195,038
Total assets [3]	2,644,393,424	3,921,323,756	4,941,072,530	5,425,184,573	5,966,306,398
Net worth [3]	1,099,645,876	1,392,233,318	1,739,529,985	1,966,848,773	2,110,695,629
Total receipts [4]	2,831,062,496	3,688,693,895	4,585,549,761	4,902,669,122	5,177,663,770
Business receipts [4]	2,656,345,750	3,434,141,360	4,290,704,760	4,567,209,064	4,794,291,330
Interest received [4,6]	47,753,626	81,135,811	86,746,437	102,537,639	116,819,943
Total deductions [4]	2,733,105,346	3,545,121,842	4,354,564,077	4,652,960,523	4,910,704,056
Cost of goods sold [4]	1,797,852,805	2,377,226,499	2,932,256,224	3,125,013,437	3,241,577,938
Interest paid	90,452,072	151,214,835	145,509,470	156,862,195	175,064,011
Net income (less deficit) [4]	113,758,645	171,373,726	260,909,947	286,059,822	305,958,154
Net income [4]	142,541,119	212,936,099	297,458,397	325,291,340	352,453,829
Deficit [4]	28,782,474	41,562,373	36,548,450	39,231,518	46,495,675
Total income tax [7]	56,687,476	64,385,522	83,817,532	95,502,448	101,849,787
Regular and alternative tax [8]	55,553,921	60,664,655	81,476,502	93,646,267	100,318,010
Total income tax after credits	25,382,459	38,971,197	54,302,936	58,883,875	64,307,381
TRANSPORTATION AND PUBLIC UTILITIES [1]					
Number of returns, total [2]	138,337	160,353	194,456	205,777	209,412
Number with net income [2]	69,938	81,418	107,285	111,811	110,657
Total assets [3]	1,246,426,899	1,522,045,738	1,903,213,778	2,069,453,023	2,219,019,293
Net worth [3]	490,481,127	508,667,821	633,131,635	714,120,889	762,083,589
Total receipts [4]	772,358,188	936,277,062	1,156,709,979	1,257,010,639	1,330,726,431
Business receipts [4]	733,943,970	874,111,070	1,086,623,231	1,183,959,691	1,247,593,251
Interest received [4,6]	12,310,594	18,194,729	22,314,329	23,432,987	26,135,120
Total deductions [4]	747,836,158	900,960,832	1,084,676,405	1,182,369,290	1,260,911,843
Cost of goods sold [4]	381,028,354	405,924,209	405,708,040	453,455,420	482,982,473
Interest paid	44,880,858	59,190,735	61,601,762	64,006,991	69,385,093
Net income (less deficit) [4]	25,087,629	35,413,596	72,911,176	75,400,172	70,984,769
Net income [4]	37,880,144	51,490,850	87,557,007	93,129,707	95,097,536
Deficit [4]	12,792,516	16,077,254	14,645,831	17,729,536	24,112,767
Total income tax [7]	15,214,129	17,114,547	27,186,351	28,376,759	28,506,843
Regular and alternative tax [8]	14,881,470	15,228,031	26,305,839	27,775,587	27,790,676
Total income tax after credits	8,432,924	15,882,038	24,836,272	25,963,903	25,582,369

Footnotes at end of table.

Selected Historical and Other Data

Table 14a. Corporation Income Tax Returns: Selected Balance Sheet, Income Statement, and Tax Items, by Standard Industrial Classification (SIC) Industrial Division, Specified Income Years, 1985-1997—Continued

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

Industrial division and item	1985	1990	1995	1996	1997
	(1)	(2)	(3)	(4)	(5)
WHOLESALE AND RETAIL TRADE [1]					
Number of returns, total [2]	917,301	1,023,057	1,132,409	1,142,491	1,149,132
Number with net income [2]	510,825	527,128	626,022	652,504	656,288
Total assets [3]	1,009,965,739	1,447,296,828	1,919,717,823	2,016,232,163	1,947,931,949
Net worth [3]	286,260,274	354,827,439	533,870,160	568,677,377	613,532,103
Total receipts [4]	2,473,865,453	3,308,988,336	4,310,346,947	4,490,073,608	4,703,816,853
Business receipts [4]	2,408,174,933	3,216,861,660	4,206,376,331	4,383,103,174	4,588,802,594
Interest received [4,6]	21,633,480	29,851,239	30,425,682	31,317,702	31,259,696
Total deductions [4]	2,440,403,373	3,279,066,687	4,247,560,773	4,418,321,110	4,624,196,186
Cost of goods sold [4]	1,869,766,621	2,482,483,270	3,255,845,728	3,378,472,096	3,523,438,346
Interest paid	38,217,998	63,914,431	59,945,319	61,708,013	65,839,595
Net income (less deficit) [4]	33,126,702	30,094,078	63,566,712	73,353,268	81,584,637
Net income [4]	51,434,500	65,383,876	97,018,112	107,999,874	117,042,233
Deficit [4]	18,307,798	35,289,798	33,451,401	34,646,606	35,457,596
Total income tax [7]	16,392,896	13,839,310	20,301,551	22,694,239	23,871,953
Regular and alternative tax [8]	16,130,885	13,324,360	20,030,374	22,435,178	23,550,018
Total income tax after credits	13,396,555	12,615,991	18,475,921	20,732,232	21,959,617
FINANCE, INSURANCE, AND REAL ESTATE [1]					
Number of returns, total [2]	518,432	609,138	683,211	723,754	744,545
Number with net income [2]	285,273	269,667	317,410	341,136	344,625
Total assets [3]	7,029,452,681	10,193,295,357	15,677,286,629	17,360,053,164	20,905,619,903
Net worth [3]	1,161,968,009	2,142,041,011	4,668,579,685	5,605,211,611	7,155,654,580
Total receipts [4]	1,182,034,309	1,954,709,651	2,278,103,923	2,406,855,250	2,711,269,836
Business receipts [5]	501,993,840	900,908,453	1,094,870,564	1,176,179,679	1,282,307,615
Interest received [4,6]	541,268,193	830,451,126	879,763,014	901,666,932	987,114,539
Total deductions [4]	1,104,572,202	1,809,867,575	1,985,795,615	2,076,613,597	2,304,339,835
Cost of goods sold [4]	237,577,803	526,244,728	614,755,680	632,948,266	661,222,720
Interest paid	363,009,417	506,921,011	433,479,978	439,762,655	501,112,985
Net income (less deficit) [4]	60,670,526	109,901,881	256,810,767	299,149,193	373,482,032
Net income [4]	90,546,934	158,458,842	295,423,415	337,822,090	413,000,341
Deficit [4]	29,876,408	48,556,962	38,612,648	38,672,897	39,518,308
Total income tax [7]	13,598,201	22,556,387	51,874,358	58,301,659	63,604,700
Regular and alternative tax [8]	13,369,981	20,709,720	50,691,121	57,556,938	62,650,267
Total income tax after credits	10,193,877	20,511,294	45,988,431	50,181,634	54,777,098
SERVICES [1]					
Number of returns, total [2]	939,390	1,029,447	1,504,230	1,557,401	1,592,854
Number with net income [2]	529,337	546,268	843,922	881,427	921,533
Total assets [3]	330,982,941	572,842,266	950,737,457	1,092,310,137	1,259,381,543
Net worth [3]	89,852,365	143,154,346	307,630,801	363,120,124	413,665,895
Total receipts [4]	534,587,609	779,329,609	1,335,694,559	1,496,215,552	1,638,587,903
Business receipts [4]	497,980,990	726,041,364	1,263,790,767	1,408,716,487	1,536,597,024
Interest received [4,6]	6,561,301	9,526,124	14,541,126	17,157,456	19,166,408
Total deductions [4]	528,685,613	769,035,909	1,297,475,364	1,453,204,496	1,589,010,688
Cost of goods sold [4]	176,070,808	290,965,307	385,562,425	437,521,006	476,468,909
Interest paid	15,027,259	27,188,190	29,967,579	33,871,749	39,371,150
Net income (less deficit) [4]	5,883,782	10,616,792	38,407,562	43,952,204	50,470,448
Net income [4]	21,124,460	34,850,560	67,389,184	79,102,121	91,879,768
Deficit [4]	15,240,678	24,233,768	28,981,622	35,149,916	41,409,320
Total income tax [7]	4,742,347	5,368,531	10,358,678	12,588,705	14,804,587
Regular and alternative tax [8]	4,621,875	5,041,377	10,155,538	12,397,017	14,568,298
Total income tax after credits	3,343,830	4,597,561	8,720,911	10,179,417	12,110,639

Footnotes at end of table.

Selected Historical and Other Data

Table 14a. Corporation Income Tax Returns: Selected Balance Sheet, Income Statement, and Tax Items, by Standard Industrial Classification (SIC) Industrial Division, Specified Income Years, 1985-1997—Continued

Footnotes

[1] Industrial classification is based on the product or service accounting for the largest percentage of "total receipts." (Total receipts are the sum of business or gross receipts, plus capital gains and income from investments, including rentals.) Starting with 1998, this classification is based on the North American Industry Classification System (NAICS), which replaced the Standard Industrial Classification (SIC) system. The SIC, in its various versions, was used to classify statistics for the years before 1998. Both systems were intended for Governmentwide use in classifying business statistics. (For information about NAICS and its usage in Canadian, Mexican, and U.S. Government statistics, see the *Statistics of Income Bulletin*, Summer 1997, Volume 17, Number 1, pp. 3-5.) Because there are substantial differences between NAICS and its predecessor SIC system, data by "industrial sector" for years beginning with 1998 (Table 14b) are shown apart from data for earlier years by "industrial division" (Table 14a). As an example of differences between the two systems, using NAICS, Statistics of Income classifies banks that were bank holding companies in the new "management of companies (holding companies)" sector, instead of in the "finance and insurance" sector. Using the SIC, bank holding companies had previously been classified in the "finance, insurance, and real estate" industrial division. For additional information about breaks in comparability caused by the changeover to NAICS, see *Statistics of Income—1998, Corporation Income Tax Returns*. If information for the business activity and product was not discernible from the corporation income tax return, the return was classified as with nature of business "not allocable." Data for nature of business "not allocable" are included in the totals for "all industrial divisions" (Table 14a) and "all industrial sectors" (Table 14b), but are not shown separately. Therefore, in addition to rounding differences, the statistics by industrial division or sector will not add to their respective grand totals.

[2] See Table 13, footnote 1.

[3] Balance sheet data are end-of-year amounts. Net worth is the sum of "capital stock," "additional paid-in capital," "retained earnings, appropriated," "retained earnings, unappropriated," and "adjustments to shareholders' equity" minus "cost of treasury stock." (Prior to 1997, data for "retained earnings, unappropriated" included "adjustments to shareholders' equity," not reported separately on the tax return.) Each of these amounts is presented separately in Table 13.

[4] See Table 13, footnotes 10 and 14.

[5] See Table 13, footnote 11.

[6] Interest received is the sum of "interest on State and local government obligations" (i.e., tax-exempt interest) and "other interest" (which includes interest paid by banking and savings institutions). Data for both of these amounts are presented separately in Table 13. See also Table 13, footnote 12.

[7] In addition to regular tax (and alternative tax) for years prior to 1988, includes certain other taxes either shown separately in Table 13 or mentioned in Table 13, footnote 18.

[8] Beginning with tax year 1987, "Alternative tax" was repealed. See also Table 13, footnote 19.

NOTES: Statistics are for corporate accounting periods ended July of one year through June of the next. Thus, for example, data for 1997 are for accounting periods ended July 1997 through June 1998. Data may not add to totals because of rounding. All amounts are in current dollars. Most of the data are subject to sampling errors. Tax law and tax form changes affect the year-to-year comparability of the data.

SOURCE: *Statistics of Income—Corporation Income Tax Returns*.

Selected Historical and Other Data

Table 14b. Corporation Income Tax Returns: Selected Balance Sheet, Income Statement, and Tax Items, by North American Industry Classification System (NAICS) Industrial Sector, Income Years 2000-2005

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

Industrial sector and item	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)
ALL INDUSTRIAL SECTORS [1]						
Number of returns, total [2]	5,045,274	5,135,591	5,266,607	5,401,237	5,557,965	5,671,257
Number with net income [2]	2,819,153	2,822,302	2,800,517	2,932,115	3,116,468	3,324,260
Total assets [3]	47,026,871,874	49,154,424,202	50,413,501,942	53,644,784,683	60,117,759,331	66,445,429,787
Net worth [3]	17,348,650,369	17,614,743,174	17,545,109,175	18,818,686,574	20,814,368,622	23,524,907,609
Total receipts [4]	20,605,808,071	20,272,957,624	19,749,426,052	20,689,574,291	22,711,863,939	25,504,789,203
Business receipts [4,5]	17,636,551,349	17,504,288,630	17,297,125,146	18,264,393,898	19,975,875,761	21,800,290,496
Interest received [4,6]	1,628,041,441	1,499,683,236	1,233,298,115	1,132,675,179	1,337,625,869	1,712,270,625
Total deductions [4]	19,691,591,726	19,682,982,949	19,198,882,118	19,940,594,557	21,636,155,758	23,612,765,507
Cost of goods sold [4]	11,135,287,909	11,041,533,030	10,607,404,004	11,318,644,763	12,497,904,654	13,816,464,452
Interest paid	1,271,678,744	1,203,045,923	912,751,562	818,016,806	938,790,256	1,287,097,591
Net income (less deficit) [4]	927,525,517	603,623,352	563,656,558	779,988,635	1,111,692,655	1,948,655,133
Net income [4]	1,336,619,605	1,112,480,551	1,053,126,217	1,175,608,990	1,455,796,796	2,234,882,109
Deficit [4]	409,094,088	508,857,198	489,469,660	395,620,355	344,104,141	286,226,977
Total income tax [7]	266,281,801	220,874,245	209,691,130	243,822,946	299,555,304	419,209,279
Regular tax	262,232,738	218,675,610	207,056,104	241,275,165	296,200,379	416,324,111
Total income tax after credits	204,043,788	166,711,988	153,612,870	177,517,404	224,435,343	312,086,477
AGRICULTURE, FORESTRY, HUNTING, AND FISHING [1]						
Number of returns, total [2]	140,851	140,806	140,223	143,019	141,553	142,439
Number with net income [2]	79,678	74,106	65,499	77,281	74,061	77,937
Total assets [3]	105,715,035	104,902,187	105,500,630	111,325,927	118,719,286	122,625,034
Net worth [3]	38,692,638	36,636,289	35,767,420	37,169,357	38,209,429	37,317,669
Total receipts [4]	117,135,698	115,434,441	119,151,243	125,741,451	136,705,535	140,748,881
Business receipts [4]	106,085,760	102,909,416	107,931,393	113,828,382	124,699,127	125,809,223
Interest received [4,6]	622,013	541,280	374,767	368,971	334,422	385,473
Total deductions [4]	115,914,854	114,621,084	119,774,426	124,462,063	134,140,348	136,056,153
Cost of goods sold [4]	59,844,373	54,841,323	60,121,105	62,045,324	67,605,321	67,746,819
Interest paid	3,580,884	3,280,134	2,923,041	2,733,424	2,777,471	2,990,415
Net income (less deficit) [4]	1,220,273	1,064,909	-587,571	1,332,547	2,580,512	4,723,729
Net income [4]	6,135,371	5,981,691	4,852,284	6,339,974	7,704,650	9,855,268
Deficit [4]	4,915,098	4,916,782	5,439,855	5,007,428	5,124,138	5,131,540
Total income tax [7]	563,797	619,708	403,902	644,189	825,138	969,072
Regular tax	553,484	615,617	399,926	635,750	817,962	966,582
Total income tax after credits	553,231	514,046	386,944	592,886	801,210	935,082
MINING [1]						
Number of returns, total [2]	32,578	31,776	30,287	30,252	30,909	32,589
Number with net income [2]	18,430	18,942	15,095	17,152	16,513	18,339
Total assets [3]	410,747,979	448,910,140	449,429,859	421,276,319	478,698,533	559,195,001
Net worth [3]	198,479,943	231,706,800	233,250,469	196,639,943	223,379,428	263,557,467
Total receipts [4]	158,618,629	169,539,555	157,298,844	194,190,254	232,552,316	314,260,412
Business receipts [4]	140,917,053	151,151,906	142,247,484	178,319,223	212,694,107	279,825,028
Interest received [4,6]	4,926,125	4,088,184	3,225,286	3,174,095	2,681,500	3,792,041
Total deductions [4]	149,060,709	160,816,530	156,911,742	184,237,912	214,322,152	270,445,817
Cost of goods sold [4]	75,033,998	80,548,021	78,092,277	98,177,788	114,712,975	147,011,520
Interest paid	10,125,194	9,923,985	9,016,218	9,240,463	9,105,520	10,051,157
Net income (less deficit) [4]	10,355,698	9,406,304	1,344,239	10,683,846	18,694,454	46,784,960
Net income [4]	15,616,089	16,240,479	9,851,990	17,265,488	24,028,229	54,937,445
Deficit [4]	5,260,391	6,834,176	8,507,752	6,581,642	5,333,776	8,152,485
Total income tax [7]	3,231,554	3,026,385	2,087,504	3,547,275	5,042,652	12,880,276
Regular tax	3,091,343	2,900,460	1,993,356	3,453,291	4,818,960	12,807,096
Total income tax after credits	2,050,087	2,064,114	1,010,103	2,030,356	3,416,154	8,657,023

Footnotes at end of table.

Selected Historical and Other Data

Table 14b. Corporation Income Tax Returns: Selected Balance Sheet, Income Statement, and Tax Items, by North American Industry Classification System (NAICS) Industrial Sector, Income Years 2000-2005—Continued

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

Industrial sector and item	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)
WHOLESALE AND RETAIL TRADE [1]						
Number of returns, total [2]	959,575	963,403	964,523	975,011	1,001,211	992,818
Number with net income [2]	547,118	552,571	514,346	538,287	583,677	584,543
Total assets [3]	2,307,635,980	2,311,538,349	2,412,864,112	2,458,482,333	2,958,971,634	3,154,245,364
Net worth [3]	752,937,787	775,273,224	812,930,683	859,282,017	1,138,704,327	1,216,728,822
Total receipts [4]	5,397,024,981	5,312,289,788	5,403,353,886	5,736,011,994	6,309,079,027	6,818,434,520
Business receipts [4]	5,267,581,834	5,183,197,415	5,278,843,887	5,601,105,942	6,167,364,953	6,652,131,497
Interest received [4,6]	27,158,306	21,959,651	19,509,672	17,660,874	19,835,305	24,460,906
Total deductions [4]	5,314,154,542	5,239,282,835	5,318,817,046	5,631,362,037	6,151,228,225	6,608,615,645
Cost of goods sold [4]	4,116,888,584	4,036,920,370	4,083,064,952	4,352,429,283	4,825,090,465	5,207,833,297
Interest paid	68,090,598	59,251,050	50,534,463	46,478,485	44,393,497	55,097,448
Net income (less deficit) [4]	85,176,192	75,366,514	87,018,582	108,098,908	161,987,422	214,851,252
Net income [4]	139,241,630	128,763,355	135,027,304	154,567,691	196,669,777	248,829,504
Deficit [4]	54,065,438	53,396,841	48,008,722	46,468,782	34,682,355	33,978,253
Total income tax [7]	29,752,161	26,419,726	27,469,057	32,256,691	42,766,473	52,477,473
Regular tax	29,389,721	26,309,437	27,296,326	32,120,034	42,699,804	52,615,992
Total income tax after credits	27,782,180	24,749,298	25,568,842	29,692,890	38,860,965	47,946,935
TRANSPORTATION AND WAREHOUSING [1]						
Number of returns, total [2]	160,437	164,492	177,745	182,881	182,614	187,051
Number with net income [2]	84,271	84,837	91,226	95,352	99,790	112,644
Total assets [3]	531,565,047	531,565,543	536,270,300	558,278,543	569,991,323	586,306,011
Net worth [3]	166,587,366	156,710,830	144,702,207	156,846,724	149,624,391	127,764,439
Total receipts [4]	527,167,358	516,415,672	533,613,159	571,417,174	623,192,018	687,092,197
Business receipts [4]	505,713,781	493,765,699	510,816,998	547,730,745	599,482,798	659,186,488
Interest received [4,6]	5,821,233	4,819,977	3,982,958	3,026,793	3,424,815	3,856,638
Total deductions [4]	519,789,746	523,754,808	542,412,614	570,180,006	618,120,932	668,435,555
Cost of goods sold [4]	162,300,008	143,664,961	151,927,768	193,253,719	197,138,222	197,138,222
Interest paid	15,623,451	14,544,173	19,266,450	12,624,295	12,097,700	14,475,447
Net income (less deficit) [4]	7,913,968	-7,061,072	-8,648,139	1,608,015	5,724,498	18,910,404
Net income [4]	19,125,558	14,117,899	14,490,713	15,802,242	21,741,796	33,149,439
Deficit [4]	11,211,590	21,178,971	23,138,852	14,194,227	16,017,298	14,239,034
Total income tax [7]	4,328,980	3,061,717	2,915,569	3,165,216	4,744,118	7,480,008
Regular tax	4,238,681	2,965,899	2,817,395	3,152,330	4,728,573	7,453,375
Total income tax after credits	3,745,610	2,836,333	2,725,995	2,740,308	4,380,591	6,655,216
INFORMATION [1]						
Number of returns, total [2]	118,073	115,435	120,271	119,875	123,862	122,825
Number with net income [2]	51,357	47,156	49,492	54,608	59,378	61,660
Total assets [3]	3,034,923,999	3,149,915,940	2,993,759,005	2,691,139,228	2,911,041,941	2,918,886,012
Net worth [3]	1,343,743,493	1,361,280,253	1,273,397,574	1,182,146,927	1,299,070,370	1,329,820,274
Total receipts [4]	967,190,036	946,598,108	909,195,188	938,674,058	993,365,314	1,053,251,269
Business receipts [4]	817,186,647	815,772,817	799,441,224	822,160,145	864,308,201	887,008,860
Interest received [4,6]	40,293,352	37,267,880	32,097,945	28,478,715	31,480,433	34,222,374
Total deductions [4]	963,202,354	986,220,330	946,955,633	947,864,644	974,681,257	981,538,561
Cost of goods sold [4]	220,902,262	213,276,295	205,183,275	213,052,675	208,160,936	211,620,172
Interest paid	73,850,231	76,883,082	69,536,498	62,442,478	65,329,075	68,065,419
Net income (less deficit) [4]	5,888,634	-37,658,246	-33,996,597	-3,996,010	22,530,595	75,408,348
Net income [4]	92,587,270	59,616,076	48,623,452	55,309,436	75,717,085	108,356,736
Deficit [4]	86,698,635	97,274,322	82,620,049	59,305,447	53,186,490	32,948,388
Total income tax [7]	25,616,216	16,406,635	12,104,214	14,026,180	17,823,432	25,288,105
Regular tax	24,990,024	16,309,070	12,076,847	13,897,774	17,622,018	24,999,397
Total income tax after credits	21,997,317	11,797,175	7,795,636	10,295,637	14,108,478	21,336,917

Footnotes at end of table.

Selected Historical and Other Data

Table 14b. Corporation Income Tax Returns: Selected Balance Sheet, Income Statement, and Tax Items, by North American Industry Classification System (NAICS) Industrial Sector, Income Years 2000-2005—Continued

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

Industrial sector and item	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)
MANAGEMENT OF COMPANIES						
(HOLDING COMPANIES) [1]						
Number of returns, total [2]	47,542	47,866	48,053	46,887	49,800	50,921
Number with net income [2]	20,979	19,818	21,267	18,786	18,672	19,399
Total assets [3]	7,917,530,297	9,356,898,892	9,739,201,697	10,094,909,965	12,443,130,858	13,487,039,096
Net worth [3]	1,237,344,020	1,386,169,730	1,482,596,398	1,311,562,906	1,845,689,046	1,828,577,565
Total receipts [4]	693,453,386	788,062,467	689,799,466	677,082,366	728,911,434	895,321,523
Business receipts [4]	127,242,280	175,450,783	170,514,329	190,225,987	170,830,009	139,325,361
Interest received [4,6]	435,503,757	457,053,813	361,954,366	339,679,108	409,980,444	526,561,282
Total deductions [4]	613,412,225	702,054,817	602,603,758	581,498,091	640,444,739	734,136,089
Cost of goods sold [4]	7,403,101	18,585,287	11,077,288	9,517,497	5,467,190	5,634,948
Interest paid	293,846,786	290,735,669	186,561,412	158,380,777	184,867,911	297,108,263
Net income (less deficit) [4]	78,208,116	83,216,188	84,572,187	93,462,818	116,033,731	161,499,246
Net income [4]	83,529,280	89,526,734	94,494,581	100,808,637	121,893,451	167,270,312
Deficit [4]	5,321,164	6,310,546	9,922,394	7,345,819	5,859,720	5,771,067
Total income tax [7]	26,800,031	28,535,815	30,444,748	32,182,303	38,654,549	51,747,954
Regular tax	26,708,372	28,461,711	30,408,844	32,122,396	38,562,149	51,635,370
Total income tax after credits	21,745,792	23,256,377	24,905,354	25,674,080	31,399,638	41,936,262
ADMINISTRATIVE AND SUPPORT						
AND WASTE MANAGEMENT AND						
REMEDIAL SERVICES [1]						
Number of returns, total [2]	211,993	223,999	231,412	242,904	245,725	257,623
Number with net income [2]	128,738	135,234	134,003	151,327	150,400	170,075
Total assets [3]	218,894,160	231,139,131	258,705,414	274,758,410	276,397,743	281,726,153
Net worth [3]	61,423,215	64,950,551	77,291,090	80,911,300	88,964,050	90,273,850
Total receipts [4]	325,399,872	352,935,179	350,216,846	377,940,515	416,277,503	455,332,505
Business receipts [4]	313,932,798	339,002,912	338,209,323	359,890,965	397,881,553	431,345,806
Interest received [4,6]	2,281,559	1,790,626	1,881,731	2,080,683	3,230,355	3,071,211
Total deductions [4]	321,181,269	345,441,035	345,261,614	370,864,108	405,784,490	432,350,429
Cost of goods sold [4]	138,959,356	152,621,002	149,702,110	170,893,885	182,110,622	198,237,179
Interest paid	7,500,383	7,002,692	6,199,583	6,503,972	7,523,112	8,141,788
Net income (less deficit) [4]	4,337,453	7,609,771	5,036,076	7,194,381	10,594,085	22,980,942
Net income [4]	12,211,170	14,784,895	13,491,618	14,226,924	18,432,328	28,157,078
Deficit [4]	7,873,717	7,175,123	8,455,542	7,032,543	7,838,244	5,176,136
Total income tax [7]	1,544,394	1,951,046	1,605,012	1,304,340	1,876,213	3,553,314
Regular tax	1,530,854	1,928,166	1,586,118	1,270,470	1,869,703	3,466,762
Total income tax after credits	1,278,157	1,520,665	1,393,675	1,092,221	1,463,551	3,103,764
EDUCATIONAL SERVICES [1]						
Number of returns, total [2]	36,756	38,480	41,317	44,059	43,956	44,885
Number with net income [2]	23,516	19,336	20,525	21,688	24,789	24,708
Total assets [3]	15,347,835	16,497,219	16,492,830	19,947,248	22,234,648	25,992,750
Net worth [3]	5,899,320	6,192,337	6,195,219	7,265,582	8,548,807	8,758,947
Total receipts [4]	25,236,070	26,922,736	25,972,274	30,684,279	33,315,699	34,297,361
Business receipts [4]	22,021,416	25,148,309	24,509,009	29,746,218	32,364,218	33,247,315
Interest received [4,6]	159,191	113,946	90,703	86,397	85,530	129,748
Total deductions [4]	24,488,516	26,509,597	24,969,680	29,222,310	30,945,287	31,596,850
Cost of goods sold [4]	4,195,289	4,820,315	3,955,244	4,895,886	4,548,507	4,778,563
Interest paid	346,595	338,259	322,399	312,979	337,689	416,058
Net income (less deficit) [4]	743,338	420,744	1,005,660	1,457,306	2,352,859	2,659,365
Net income [4]	1,758,495	1,641,837	1,877,456	2,352,880	3,088,203	3,491,097
Deficit [4]	1,015,157	1,221,094	871,796	895,575	735,344	831,732
Total income tax [7]	297,442	229,931	264,236	341,140	471,540	606,785
Regular tax	296,332	229,079	263,846	337,968	470,375	605,904
Total income tax after credits	287,334	218,742	248,573	331,442	462,127	596,579

Footnotes at end of table.

Selected Historical and Other Data

Table 14b. Corporation Income Tax Returns: Selected Balance Sheet, Income Statement, and Tax Items, by North American Industry Classification System (NAICS) Industrial Sector, Income Years 2000-2005—Continued

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

Industrial sector and item	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)
UTILITIES [1]						
Number of returns, total [2]	7,044	7,968	7,802	7,863	8,504	7,536
Number with net income [2]	4,620	4,276	3,855	3,934	4,425	5,275
Total assets [3]	1,171,606,471	1,556,911,256	1,515,428,318	1,458,642,427	1,454,677,579	1,487,753,576
Net worth [3]	374,868,607	382,030,374	381,352,597	381,185,739	364,426,969	358,435,669
Total receipts [4]	516,184,353	756,808,494	1,051,655,475	578,342,692	560,857,066	652,929,657
Business receipts [4]	478,836,511	707,815,083	1,004,358,112	537,883,736	521,884,927	604,140,085
Interest received [4,6]	9,222,895	12,932,306	13,035,317	12,550,519	10,492,402	10,973,001
Total deductions [4]	477,659,203	728,553,279	1,036,080,852	580,005,825	566,004,187	632,204,330
Cost of goods sold [4]	301,858,130	517,574,723	795,765,082	340,182,014	324,140,437	378,142,678
Interest paid	30,445,753	39,224,772	42,280,631	41,316,770	38,760,041	36,461,886
Net income (less deficit) [4]	39,017,164	29,169,974	16,804,566	-1,046,609	-4,728,496	20,830,603
Net income [4]	42,332,613	35,279,980	28,734,461	22,596,105	14,461,224	33,724,635
Deficit [4]	3,315,449	6,110,006	11,929,895	23,642,715	19,189,721	12,894,031
Total income tax [7]	14,087,853	10,617,977	9,151,930	6,504,039	4,565,498	9,591,733
Regular tax	13,916,825	10,420,441	9,071,527	6,382,751	4,483,781	9,377,027
Total income tax after credits	12,912,267	9,383,513	7,718,038	5,296,222	3,502,071	7,837,467
CONSTRUCTION [1]						
Number of returns, total [2]	580,302	597,902	624,478	648,535	676,120	751,521
Number with net income [2]	374,809	373,746	376,822	382,349	401,721	489,228
Total assets [3]	463,072,728	504,719,698	525,704,293	540,502,611	566,392,613	714,365,062
Net worth [3]	139,215,432	149,948,101	150,498,208	163,014,462	154,875,559	207,041,138
Total receipts [4]	990,661,562	1,051,896,139	1,102,724,183	1,098,818,871	1,147,627,639	1,452,508,509
Business receipts [4]	973,521,174	1,034,087,166	1,084,579,920	1,080,555,117	1,128,834,453	1,427,006,853
Interest received [4,6]	3,050,095	3,466,222	3,062,738	2,474,298	2,565,635	2,887,075
Total deductions [4]	957,850,706	1,019,743,542	1,070,080,498	1,070,369,680	1,118,068,122	1,378,115,248
Cost of goods sold [4]	734,146,024	776,692,461	809,614,689	799,324,059	832,053,060	1,048,888,259
Interest paid	8,717,303	10,202,001	10,270,932	9,289,390	9,720,872	10,834,270
Net income (less deficit) [4]	32,654,317	32,067,010	32,537,032	28,357,934	29,368,117	74,356,808
Net income [4]	42,285,794	43,775,887	46,179,690	45,359,266	48,125,249	87,829,487
Deficit [4]	9,631,477	11,708,877	13,642,657	17,001,332	18,757,132	13,472,680
Total income tax [7]	4,375,585	4,460,645	4,543,459	4,221,133	4,598,022	9,807,183
Regular tax	4,280,010	4,373,768	4,497,744	4,178,296	4,560,661	9,751,893
Total income tax after credits	4,142,447	4,308,656	4,435,401	4,104,446	4,471,956	9,524,912
MANUFACTURING [1]						
Number of returns, total [2]	297,714	288,506	278,995	280,185	281,239	277,618
Number with net income [2]	184,923	168,580	147,291	149,710	145,867	167,182
Total assets [3]	6,812,198,288	7,830,525,859	8,100,072,543	8,202,169,904	8,827,565,222	10,440,305,266
Net worth [3]	2,347,201,417	2,919,128,199	2,949,917,887	2,975,211,477	3,259,807,483	3,810,766,667
Total receipts [4]	5,207,025,164	5,741,290,322	5,315,598,814	5,257,106,442	5,642,551,645	7,279,554,873
Business receipts [4]	4,801,823,220	5,259,173,394	4,862,174,424	4,822,650,951	5,194,506,715	6,505,757,036
Interest received [4,6]	113,423,902	136,081,123	130,752,374	119,947,354	117,887,111	145,577,801
Total deductions [4]	4,996,507,899	5,514,263,661	5,228,295,401	5,178,748,932	5,509,877,426	6,679,637,501
Cost of goods sold [4]	3,278,506,854	3,646,003,664	3,402,032,548	3,353,642,529	3,691,657,743	4,756,208,056
Interest paid	184,827,327	216,950,701	210,704,804	184,028,822	175,745,011	212,640,877
Net income (less deficit) [4]	247,281,612	271,917,037	129,096,121	119,275,059	186,085,821	680,058,202
Net income [4]	311,008,480	355,433,559	269,346,456	245,134,412	284,701,913	734,658,056
Deficit [4]	63,726,868	83,516,521	140,250,335	125,859,352	98,616,092	54,599,854
Total income tax [7]	87,650,593	102,107,461	76,141,754	68,531,196	82,534,697	157,671,750
Regular tax	86,663,477	100,717,097	75,778,613	67,606,219	82,027,984	157,112,188
Total income tax after credits	56,836,653	62,146,298	43,292,557	34,400,275	42,840,125	90,506,840

Footnotes at end of table.

Selected Historical and Other Data

Table 14b. Corporation Income Tax Returns: Selected Balance Sheet, Income Statement, and Tax Items, by North American Industry Classification System (NAICS) Industrial Sector, Income Years 2000-2005—Continued

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

Industrial sector and item	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)
FINANCE AND INSURANCE [1]						
Number of returns, total [2]	217,780	221,394	220,895	224,352	234,746	242,686
Number with net income [2]	134,024	140,245	140,018	141,771	153,780	167,924
Total assets [3]	19,824,587,927	20,812,549,796	21,088,851,299	21,937,110,016	24,336,630,885	30,392,706,733
Net worth [3]	8,940,180,581	9,508,950,313	9,559,259,468	9,422,754,290	10,639,646,968	13,540,857,299
Total receipts [4]	3,008,131,381	2,915,539,562	2,621,771,654	2,605,571,614	2,575,206,914	3,301,642,987
Business receipts [4,5]	1,740,167,487	1,525,629,096	1,430,898,834	1,573,271,535	1,571,588,951	1,798,196,722
Interest received [4,6]	811,320,049	936,422,920	806,514,689	660,002,353	593,235,118	934,940,428
Total deductions [4]	2,610,951,725	2,499,971,633	2,321,050,152	2,324,723,707	2,240,823,839	2,764,686,695
Cost of goods sold [4]	1,162,852,049	875,995,480	828,320,672	835,466,854	818,675,183	990,381,743
Interest paid	392,893,417	474,253,886	421,275,484	291,740,227	249,072,837	515,303,986
Net income (less deficit) [4]	360,667,738	379,017,708	268,142,171	247,012,845	303,014,325	500,563,173
Net income [4]	393,580,700	422,936,185	328,604,216	304,543,767	341,858,827	530,336,105
Deficit [4]	32,912,962	43,918,477	60,462,045	57,530,922	38,844,502	29,772,932
Total income tax [7]	40,300,522	43,609,913	39,068,012	41,867,335	52,991,696	66,391,944
Regular tax	39,435,856	42,763,433	37,998,253	40,872,057	51,620,051	65,098,055
Total income tax after credits	33,861,687	36,939,212	34,189,718	36,100,698	44,306,591	54,959,137
REAL ESTATE AND RENTAL AND LEASING [1]						
Number of returns, total [2]	521,447	532,426	539,965	570,639	577,400	641,947
Number with net income [2]	207,998	212,683	203,699	207,925	219,872	270,082
Total assets [3]	555,038,279	562,512,765	553,968,402	538,584,064	559,092,671	766,334,870
Net worth [3]	148,473,459	155,887,764	151,968,943	147,198,160	161,103,312	215,718,480
Total receipts [4]	215,874,696	235,179,818	239,598,864	230,647,035	233,291,211	316,578,467
Business receipts [4,5]	185,450,183	204,519,672	207,454,856	205,206,751	207,243,701	268,384,638
Interest received [4,6]	6,782,681	5,525,181	4,864,674	4,046,822	4,213,588	8,767,451
Total deductions [4]	209,273,861	228,930,442	234,230,846	227,363,978	227,270,188	286,395,700
Cost of goods sold [4]	44,747,394	50,813,666	48,227,121	50,124,303	47,394,165	56,170,584
Interest paid	16,981,007	18,199,502	19,896,544	14,123,528	13,675,965	18,483,490
Net income (less deficit) [4]	6,486,094	6,137,855	5,360,069	3,253,378	6,062,925	29,777,730
Net income [4]	17,966,220	19,286,447	18,754,185	18,134,864	21,144,158	42,366,578
Deficit [4]	11,480,126	13,148,592	13,394,117	14,881,486	15,081,233	12,588,848
Total income tax [7]	2,530,093	2,454,250	2,361,366	2,012,011	2,370,340	4,559,849
Regular tax	2,377,866	2,376,474	2,321,058	1,974,547	2,314,379	4,427,618
Total income tax after credits	2,395,153	2,347,572	2,218,940	1,958,106	2,308,035	4,393,676
PROFESSIONAL, SCIENTIFIC, AND TECHNICAL SERVICES [1]						
Number of returns, total [2]	657,153	689,412	709,837	736,005	760,087	786,275
Number with net income [2]	409,951	409,706	416,900	429,535	444,869	497,262
Total assets [3]	373,290,013	499,987,766	483,351,824	484,691,832	507,815,971	645,918,660
Net worth [3]	139,391,301	213,025,814	189,543,565	171,783,018	181,546,066	234,387,953
Total receipts [4]	604,083,026	658,747,358	665,085,183	683,879,755	720,418,313	855,507,620
Business receipts [4]	576,276,292	623,368,137	631,691,343	651,992,903	691,608,915	814,499,239
Interest received [4,6]	4,427,474	7,621,540	6,196,145	4,668,720	3,889,678	6,244,155
Total deductions [4]	591,035,814	666,570,144	671,016,867	681,976,681	711,836,442	825,169,038
Cost of goods sold [4]	183,976,411	202,015,796	189,914,383	199,415,154	202,329,198	237,595,161
Interest paid	7,612,211	10,317,850	9,404,961	9,040,336	8,682,585	11,618,380
Net income (less deficit) [4]	13,263,768	-7,551,100	-5,614,567	2,463,356	9,277,744	30,931,686
Net income [4]	39,516,735	42,508,155	41,323,639	42,831,929	44,316,435	64,986,986
Deficit [4]	26,252,968	50,059,255	46,938,207	40,368,574	35,038,691	34,055,300
Total income tax [7]	4,784,997	4,910,603	3,943,006	3,769,108	3,671,651	5,578,429
Regular tax	4,735,208	4,879,740	3,931,563	3,736,566	3,682,859	5,500,953
Total income tax after credits	4,088,564	4,394,637	3,277,227	3,191,317	3,066,840	4,787,165

Footnotes at end of table.

Selected Historical and Other Data

Table 14b. Corporation Income Tax Returns: Selected Balance Sheet, Income Statement, and Tax Items, by North American Industry Classification System (NAICS) Industrial Sector, Income Years 2000-2005—Continued

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

Industrial sector and item	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)
HEALTH CARE AND SOCIAL ASSISTANCE [1]						
Number of returns, total [2]	303,499	306,352	327,338	334,305	354,603	380,940
Number with net income [2]	179,919	188,153	207,968	209,306	224,155	256,308
Total assets [3]	216,011,347	220,349,973	213,775,949	214,329,877	229,814,061	251,942,127
Net worth [3]	65,619,372	64,661,550	56,901,435	61,960,368	64,342,783	75,355,259
Total receipts [4]	385,912,697	417,490,766	443,351,714	463,253,527	503,083,460	531,900,286
Business receipts [4]	371,442,071	403,580,914	429,190,484	448,427,967	488,409,511	514,547,924
Interest received [4,6]	1,808,445	2,067,609	1,798,075	1,320,255	1,270,834	1,349,939
Total deductions [4]	380,770,874	409,842,606	430,956,238	446,522,542	484,367,139	504,954,704
Cost of goods sold [4]	46,030,202	53,847,300	54,435,340	54,589,386	58,438,250	50,978,799
Interest paid	7,731,279	8,324,621	7,640,537	6,462,090	6,582,610	7,137,241
Net income (less deficit) [4]	5,076,755	7,649,931	12,335,681	16,631,149	18,630,604	26,796,387
Net income [4]	15,190,047	17,011,710	20,364,434	23,695,054	25,543,515	34,337,672
Deficit [4]	10,113,292	9,361,779	8,028,753	7,063,905	6,912,911	7,541,285
Total income tax [7]	1,779,862	1,663,812	1,774,653	2,059,337	2,137,289	3,384,578
Regular tax	1,762,161	1,651,580	1,771,057	2,053,582	2,123,128	3,349,680
Total income tax after credits	1,726,157	1,559,356	1,741,421	2,011,275	2,087,431	3,292,091
ARTS, ENTERTAINMENT, AND RECREATION [1]						
Number of returns, total [2]	93,922	97,866	102,631	110,609	110,119	116,451
Number with net income [2]	44,376	44,318	48,884	53,390	50,037	58,650
Total assets [3]	81,870,705	75,631,069	78,565,805	79,600,495	79,164,279	100,547,530
Net worth [3]	22,987,987	19,953,303	19,144,846	19,238,866	17,869,953	29,885,647
Total receipts [4]	76,849,223	70,085,901	75,491,312	78,918,432	76,855,082	87,970,407
Business receipts [4]	70,756,712	64,157,666	69,089,923	72,674,159	69,877,627	80,148,880
Interest received [4,6]	1,001,877	1,067,454	1,000,658	811,809	743,741	657,085
Total deductions [4]	76,004,686	69,649,259	75,071,517	78,066,513	75,624,795	83,837,483
Cost of goods sold [4]	15,558,840	14,012,402	14,108,775	15,445,331	14,036,996	15,804,379
Interest paid	3,153,120	3,133,918	3,330,751	2,936,172	2,784,090	2,832,434
Net income (less deficit) [4]	821,493	413,339	402,181	852,149	1,227,441	4,117,704
Net income [4]	4,931,288	5,038,654	5,233,174	5,346,441	5,338,360	8,205,610
Deficit [4]	4,109,794	4,625,314	4,830,992	4,494,292	4,110,919	4,087,906
Total income tax [7]	498,551	508,011	396,641	349,418	299,303	739,601
Regular tax	452,837	494,747	392,960	344,655	291,786	735,734
Total income tax after credits	452,800	447,722	351,460	294,113	252,586	645,929
ACCOMMODATION, FOOD SERVICES, AND DRINKING PLACES [1]						
Number of returns, total [2]	252,113	257,525	259,465	271,527	278,722	287,490
Number with net income [2]	122,757	134,231	134,539	136,427	135,243	149,581
Total assets [3]	307,607,229	326,257,810	344,864,784	352,661,519	357,413,221	407,241,600
Net worth [3]	97,933,991	99,048,857	103,668,236	108,766,030	113,180,184	117,180,812
Total receipts [4]	342,083,590	375,040,371	353,715,274	399,787,328	407,107,664	438,570,716
Business receipts [4]	318,528,271	346,989,626	328,552,525	372,418,853	382,358,626	395,731,456
Interest received [4,6]	3,924,941	4,529,172	3,978,882	3,834,780	3,306,364	3,995,430
Total deductions [4]	332,848,457	364,913,806	345,725,252	391,952,542	400,097,877	411,365,654
Cost of goods sold [4]	131,317,833	143,111,384	122,785,758	152,332,352	158,705,517	142,538,960
Interest paid	12,290,148	14,325,258	13,229,659	12,583,288	11,730,733	12,896,377
Net income (less deficit) [4]	10,066,516	10,316,662	8,198,950	8,033,793	7,157,592	27,759,730
Net income [4]	16,629,585	17,113,147	15,491,509	15,772,353	15,472,058	34,677,667
Deficit [4]	6,563,069	6,796,485	7,292,559	7,738,560	8,314,466	6,917,937
Total income tax [7]	3,128,707	3,104,821	2,623,444	2,567,514	2,509,150	5,736,976
Regular tax	3,036,759	3,049,904	2,576,230	2,551,626	2,501,073	5,680,822
Total income tax after credits	2,315,528	2,390,708	1,947,518	1,740,440	1,711,725	4,265,816

Footnotes at end of table.

Selected Historical and Other Data

Table 14b. Corporation Income Tax Returns: Selected Balance Sheet, Income Statement, and Tax Items, by North American Industry Classification System (NAICS) Industrial Sector, Income Years 2000-2005—Continued

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

Industrial sector and item	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)
OTHER SERVICES [1]						
Number of returns, total [2]	316,138	325,602	321,134	329,336	332,662	344,877
Number with net income [2]	182,268	187,784	173,951	176,351	180,415	193,219
Total assets [3]	93,844,830	98,164,009	92,666,071	95,847,187	97,029,940	102,185,400
Net worth [3]	30,704,809	33,548,788	27,827,023	29,946,557	29,981,654	32,370,716
Total receipts [4]	170,060,184	174,835,529	164,353,067	170,732,940	174,224,783	188,874,502
Business receipts [4]	164,175,721	168,989,458	159,401,281	164,976,728	168,627,539	183,985,574
Interest received [4,6]	1,561,266	840,414	522,003	515,071	405,480	398,586
Total deductions [4]	165,502,185	170,800,214	161,284,099	166,821,367	170,980,294	183,196,098
Cost of goods sold [4]	68,810,776	70,937,697	63,754,139	66,924,017	68,043,735	75,338,923
Interest paid	3,748,882	3,035,734	2,472,820	2,538,029	2,425,120	2,542,655
Net income (less deficit) [4]	4,547,256	4,039,477	3,094,837	4,062,491	3,250,105	5,660,308
Net income [4]	7,811,408	7,750,193	6,976,867	7,962,590	7,589,437	9,712,402
Deficit [4]	3,264,152	3,710,716	3,882,031	3,900,100	4,339,332	4,052,094
Total income tax [7]	697,705	616,629	515,266	677,787	568,422	744,251
Regular tax	694,957	614,779	513,131	679,269	564,145	739,663
Total income tax after credits	674,380	580,567	480,323	520,041	522,868	705,667

[1] Industrial classification is based on the product or service accounting for the largest percentage of "total receipts." (Total receipts are the sum of business or gross receipts, plus capital gains and income from investments, including rentals.) This classification is based on the North American Industry Classification System (NAICS). The system was intended for Governmentwide use in classifying business statistics. (For information about NAICS and its usage in Canadian, Mexican, and U.S. Government statistics, see the *Statistics of Income Bulletin*, Summer 1997, Volume 17, Number 1, pp. 3-5.). If information for the business activity and product was not discernible from the corporation income tax return, the return was classified as with nature of business "not allocable." Data for nature of business "not allocable" are included in the totals for "all industrial sectors," but are not shown separately. Therefore, in addition to rounding differences, the statistics by industrial sector will not add to their respective grand totals.

[2] See Table 13, footnote 1.

[3] Balance sheet data are end-of-year amounts. Net worth is the sum of "capital stock," "additional paid-in capital," "retained earnings, appropriated," "retained earnings, unappropriated," and "adjustments to shareholders' equity" minus "cost of treasury stock." Each of these amounts is presented separately in Table 13.

[4] See Table 13, footnotes 10 and 14.

[5] See Table 13, footnote 11.

[6] Interest received is the sum of "interest on State and local government obligations" (i.e., tax-exempt interest) and "other interest" (which includes interest paid by banking and savings institutions). Data for both of these amounts are presented separately in Table 13. See also Table 13, footnote 12.

[7] In addition to regular tax, includes certain other taxes either shown separately in Table 13 or mentioned in Table 13, footnote 18.

NOTES: Statistics are for corporate accounting periods ending July of one year through June of the next. Thus, for example, data for 2005 are for accounting periods ending July 2005 through June 2006. Detail may not add to totals because of rounding. All amounts are in current dollars. Most of the data are subject to sampling error. Tax law and tax form changes affect the year-to-year comparability of the data.

Selected Historical and Other Data

Table 15. Corporation Profits Before Tax per National Income and Product Accounts (NIPA) and per Statistics of Income (SOI), and Income Subject to Tax per SOI, Income Years 1960-2005

[All figures are estimates—money amounts are in billions of dollars]

Income year	Profits before tax (per NIPA) [1,2]	Net income (less deficit) (per SOI) [3]	Income subject to tax (per SOI) [3,4]
	(1)	(2)	(3)
1960	51.6	43.5	47.2
1961	51.6	45.9	47.9
1962	57.0	49.6	51.7
1963	62.1	54.3	54.3
1964	69.1	61.6	60.4
1965	80.2	73.9	70.8
1966	86.7	80.5	77.1
1967	83.5	78.2	74.8
1968	92.4	86.0	81.4
1969	91.4	80.2	81.2
1970	81.0	65.9	72.4
1971	92.9	79.7	83.2
1972	107.8	96.8	95.1
1973	134.8	120.4	115.5
1974	147.8	148.2	144.0
1975	145.5	142.6	146.6
1976	179.7	185.4	183.5
1977	210.4	219.2	212.5
1978	246.1	246.9	239.6
1979	271.9	284.6	279.4
1980	253.5	239.0	246.6
1981	243.7	213.6	241.5
1982	198.5	154.3	205.2
1983	233.9	188.3	218.7
1984	268.6	232.9	257.1
1985	257.4	240.1	266.1
1986	246.0	269.5	276.2
1987	317.6	328.2	311.8
1988	386.1	413.0	383.2
1989	383.7	389.0	371.1
1990	409.5	370.6	366.4
1991	423.0	344.9	350.0
1992	461.1	402.0	377.9
1993	517.1	498.2	436.8
1994	577.1	577.3	494.0
1995	674.3	714.2	564.7
1996	733.0	806.5	639.8
1997	798.2	915.4	683.8
1998	718.3	838.2	663.4
1999	775.9	929.0	693.7
2000	773.4	927.5	760.4
2001	707.9	603.6	635.3
2002	768.4	563.7	600.6
2003	[r] 908.1	780.0	699.3
2004	[r] 1,204.7	1,111.7	857.4
2005	1,579.6	1,948.7	1,201.3

[r] Revised or corrected.

[1] In general, includes profits of U.S. corporations filing income tax returns as recorded in Statistics of Income, but with exceptions and adjustments (see below). Also includes profits of nonprofit institutions that primarily serve business and income of Federal Reserve Banks and Federally-sponsored credit agencies. However, profits of S corporations, only partially included in Statistics of Income data for recent years, are excluded from profits in the National Income and Product Accounts (NIPAs) and are treated, instead, as "personal income" (see Table 4). For other corporations excluded in NIPA profits, see footnote 2, below, and footnote 1, Table 13. Compared to Statistics of Income net income, profits for NIPA purposes are defined to include tax-exempt interest on State and local government obligations, but to exclude capital gains and losses, intercorporate dividends received, depletion, and bad debt losses. Consistent with Statistics of Income, NIPA profits reflect the inventory and depreciation accounting practices used for tax purposes. NIPA profits include income earned abroad by U.S. corporations, but exclude profits earned in the United States by foreign corporations.

[2] Reflects changes made to data as part of the 2003 Comprehensive Revision of the National Income and Product Accounts (NIPAs). For details of this revision, see the Bureau of Economic Analysis Web site at <http://www.bea.gov/bea/dn/2003benchmark/CR2003content.htm>.

Selected Historical and Other Data

Table 15. Corporation Profits Before Tax per National Income and Product Accounts (NIPA) and per Statistics of Income (SOI), and Income Subject to Tax per SOI, Income Years 1960-2005—Continued

Footnotes—Continued

[3] For Statistics of Income, "net income (less deficit)" and "income subject to tax" exclude taxable cooperatives, starting with the 1985 data; Real Estate Mortgage Investment Conduits (REMICs), starting with 1987; and Personal Service Corporations for 1988-1993. Net income (less deficit), starting with 1985, excludes Foreign Sales Corporations (FSCs) and Interest-Charge Domestic International Sales Corporations (IC-DISCs). See also Table 13, footnote 1. For changes in the definition of Regulated Investment Company and S corporation net income, see Table 13, footnote 16. For the coverage of corporations and the definition of corporate profits used for the National Income and Product Accounts, see footnote 1, above.

[4] For the definition of "income subject to tax," see Table 13, footnote 17. See also footnote 3, above.

NOTES: All amounts are in current dollars. Most of the data are subject to sampling error. Tax law and tax form changes affect the year-to-year comparability of the data.

SOURCE: Data on corporate "Profits before tax (per NIPA)" are from the Bureau of Economic Analysis's National Income and Product Accounts, Table 1.12: National Income by Type of Income. This table appears in the Survey of Current Business and can also be accessed online at: <http://www.bea.gov/bea/dn/nipaweb/index.asp>.

Data on "Net income (less deficit) (per SOI)" and "Income subject to tax (per SOI)" are from Statistics of Income—Corporation Income Tax Returns, various years.

Selected Historical and Other Data

Table 16. Nonprofit Charitable Organization and Domestic Private Foundation Information Returns, and Exempt Organization Business Income Tax Returns: Selected Financial Data, 1997-2004

[All figures are estimates based on samples—money amounts are in millions of dollars]

Type of return or item	1997	1998	1999	2000	2001	2002	2003	2004
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
NONPROFIT CHARITABLE ORGANIZATION INFORMATION RETURNS [1]								
Number of returns	198,957	207,272	211,615	230,159	240,569	251,676	263,353	276,191
Total assets, book value [2]	1,438,977	1,351,541	1,453,675	1,562,536	1,631,719	1,733,852	1,899,857	2,058,610
Total liabilities [2]	624,978	459,188	481,444	539,367	611,390	693,576	735,600	782,510
Net assets [2]	813,998	892,353	972,232	1,023,169	1,020,329	1,040,275	1,164,257	1,276,100
Total revenue	754,616	752,044	800,676	866,208	896,974	955,267	1,072,171	1,152,989
Program service revenue [3]	486,407	502,832	518,111	579,081	630,817	691,791	754,585	801,199
Contributions, gifts, and grants	146,171	161,751	174,992	199,076	212,427	214,484	229,987	248,570
Membership dues and assessments	6,823	6,952	6,331	6,660	7,239	7,879	8,155	8,193
Other	115,215	80,508	101,242	81,392	46,491	4,113	79,444	95,028
Total expenses	677,143	684,566	714,487	796,434	862,721	934,672	1,009,675	1,058,489
Excess of revenue over expenses (net)	77,473	67,478	86,189	69,775	34,253	20,595	62,496	94,500
DOMESTIC PRIVATE FOUNDATION INFORMATION RETURNS								
Number of returns, total	55,113	56,658	62,694	66,738	70,787	73,255	76,348	76,897
Nonoperating foundations	50,541	52,460	58,840	61,501	63,650	67,101	70,004	70,613
Operating foundations	4,572	4,198	3,854	5,238	7,137	6,154	6,344	6,284
Total assets, book value [2]	280,920	325,672	384,565	409,524	413,577	383,516	418,510	455,534
Total assets, fair market value [2]	342,689	397,084	466,863	471,646	455,423	413,007	474,952	509,924
Investments in securities [2]	272,412	317,900	363,442	361,418	329,353	294,385	344,314	361,158
Total revenue	55,460	59,735	83,286	72,780	45,264	27,775	48,391	58,668
Total expenses	22,414	25,902	33,876	37,434	36,661	34,392	35,099	36,552
Contributions, gifts, and grants paid [4]	16,421	19,394	22,763	27,564	27,383	26,303	26,667	27,625
Excess of revenue over expenses (net)	33,046	33,833	49,410	35,346	8,602	-6617.7	13,292	22,116
Net investment income [5]	34,801	39,313	57,142	48,830	25,719	17,648	25,193	34,019
EXEMPT ORGANIZATION UNRELATED BUSINESS INCOME TAX RETURNS [6]								
Number of returns, total	39,302	46,208	42,151	38,567	35,540	35,103	36,064	38,040
With unrelated business taxable income	20,827	24,332	20,718	19,336	15,277	14,495	15,580	18,099
Without unrelated business taxable income	18,475	21,876	21,433	19,231	20,264	20,608	20,484	19,941
Gross unrelated business income [7]	7,809	7,585	7,722	8,413	7,900	7,776	8,436	9,492
Total deductions [7,8,9]	6,903	6,484	6,835	7,703	7,883	7,922	8,413	8,980
Unrelated business taxable income (less deficit) [8]	906	1,100	887	710	18	-146	23	512
Unrelated business taxable income	1,375	1,670	1,485	1,427	792	647	780	1,288
Deficit [8]	469	569	598	717	774	793	757	776
Unrelated business income tax	418	506	423	406	226	194	220	365
Total tax [10]	423	464	422	403	222	193	221	368

[1] Includes data reported by organizations described in Internal Revenue Code section 501(c)(3), excluding private foundations and most religious organizations.

Organizations with receipts under \$25,000 were not required to file.

[2] Balance sheet data are end-of-year amounts.

[3] Represents fees collected by organizations in support of their tax-exempt purposes, and income such as tuition and fees at educational institutions, hospital patient charges, and admission and activity fees collected by museums and other nonprofit organizations or institutions.

[4] The amount of contributions, gifts, and grants shown reflects the amount actually disbursed, on a cash basis, for charitable purposes.

[5] Represents income not considered related to a foundation's charitable purpose, e.g., interest, dividends, and capital gains. Foundations could be subject to an excise tax on such income.

[6] Includes returns filed by or for entities described in Internal Revenue Code sections 401(a) (qualified pension, profit-sharing, or stock bonus plans), 408(e) (Individual Retirement Arrangements, or IRAs), 408A (Roth IRAs), and 501(c)(2) through 501(c)(27) (charitable and most other types of tax-exempt organizations).

[7] The primary reason for the drop in gross unrelated business income (UBI) and total deductions between Tax Years 1997 and 1998 is the exclusion from the 1998 statistics of one association, which reported relatively large amounts of gross UBI and deductions for 1997 and prior years. The tax-exempt status of this association was terminated, effective 1998. For additional information see Riley, Margaret, "Unrelated Business Income Tax Returns, 1998," *Statistics of Income Bulletin*, Spring 2002, Volume 21, Number 4.

[8] Aggregate amounts of total deductions, unrelated business taxable income (less deficit), and deficit previously published in various issues of the *Statistics of Income Bulletin* have been adjusted in Table 16 for years prior to 1999. The revisions were required to take into account certain adjustments made to reported amounts of the "net operating loss deduction." During processing of the SOI sample of Tax Year 1999 returns, it was discovered that many Form 990-T filers were deducting the entire amount of any previous year's net operating loss carryover from net income (even when net income was zero or negative), rather than deducting only the part of the carryover amount needed to offset any positive net income amount.

[9] Excludes cost of sales and services, which was subtracted from gross receipts from sales and services in computing gross profit from sales and services. Gross profit from sales and services is a component of "gross unrelated business income" (on which the filing requirement is based).

Selected Historical and Other Data

Table 16. Nonprofit Charitable Organization and Domestic Private Foundation Information Returns, and Exempt Organization Business Income Tax Returns: Selected Financial Data, 1997-2004—Continued

Footnotes—Continued

[10] Total tax was unrelated business income tax less the foreign tax credit, general business credit, credit for prior-year minimum tax, and other allowable credits, plus the proxy tax on certain lobbying expenditures (applicable only to tax years after 1993), the "alternative minimum tax," and the environmental tax (applicable only to tax years prior to 1996). Beginning with Tax Year 2001, total tax also can include interest due, computed under the look-back method for certain depreciated property and completed long-term contracts, and "other" taxes, as described by the return filer.

NOTES: Detail may not add to totals because of rounding. All amounts are in current dollars. Most of the data are subject to sampling error. Tax law and tax form changes affect the year-to-year comparability of the data.

Selected Historical and Other Data

Table 17. Taxable Estate Tax Returns as a Percentage of Adult Deaths, Selected Years of Death, 1934-2004

[Money amounts are in thousands of dollars [1]]

Selected year of death [2]	Total adult deaths [3]	Taxable estate tax returns [4,5]			
		Number	Percentage of adult deaths	Total gross estate at date of death	Estate tax after credits
	(1)	(2)	(3)	(4)	(5)
1934	983,970	8,655	0.88	2,197,941	153,763
1935	1,172,245	9,137	0.78	2,084,269	195,301
1936	1,257,290	12,010	0.96	2,561,906	305,784
1937	1,237,585	13,220	1.07	2,844,112	314,620
1938	1,181,275	12,720	1.08	2,564,072	276,707
1939	1,205,072	12,907	1.07	2,441,960	250,360
1940	1,237,186	13,336	1.08	2,578,314	291,758
1941	1,216,855	13,493	1.11	2,550,473	308,342
1942	1,211,391	12,726	1.05	2,452,340	362,164
1943	1,277,009	12,154	0.95	2,720,000	404,638
1944	1,238,917	13,869	1.12	3,245,624	531,052
1946	1,239,713	18,232	1.47	3,993,298	621,966
1947	1,278,856	19,742	1.54	4,445,326	714,707
1948	1,283,601	17,469	1.36	4,271,852	567,421
1949	1,285,684	17,411	1.35	4,126,358	483,520
1950	1,304,343	18,941	1.45	4,655,892	577,401
1953	1,237,741	24,997	2.02	6,287,867	778,504
1954	1,332,412	25,143	1.89	6,387,246	778,342
1956	1,289,193	32,131	2.49	8,903,611	1,176,710
1958	1,358,375	38,515	2.84	9,995,884	1,185,620
1960	1,426,148	45,439	3.19	12,733,459	1,618,548
1962	1,483,846	55,207	3.72	14,713,504	1,840,972
1965	1,578,813	67,404	4.27	18,820,065	2,414,310
1969	1,796,055	93,424	5.20	23,459,524	2,999,965
1972	1,854,146	120,761	6.51	33,293,565	4,153,250
1976	1,819,107	139,115	7.65	40,578,379	4,979,112
1982	1,897,820	34,426	1.81	31,903,845	4,937,216
1983	1,945,913	34,899	1.79	33,434,470	5,073,787
1984	1,968,128	30,436	1.55	34,201,557	5,012,750
1985	2,015,070	22,326	1.11	35,168,822	6,044,292
1986	2,033,978	21,923	1.08	37,799,304	6,276,800
1987	2,053,084	18,157	0.88	40,907,217	6,392,989
1988	2,096,704	20,864	1.00	43,413,056	7,432,376
1989	2,079,035	23,096	1.11	51,062,975	8,953,181
1990	2,079,034	24,647	1.19	53,698,028	9,217,499
1991	2,101,746	26,680	1.27	55,363,655	9,617,366
1992	2,111,617	27,235	1.29	59,707,135	10,474,949
1993	2,204,366	32,062	1.45	72,047,377	12,559,769
1994	2,216,736	32,565	1.47	69,492,783	12,312,421
1995	2,252,471	36,651	1.63	78,756,293	14,259,048
1996	2,314,254	41,714	1.80	95,003,317	16,336,256
1997	2,258,366	47,800	2.12	104,860,580	19,957,705
1998	2,282,055	49,913	2.19	117,965,303	22,676,230
1999	2,336,840	53,819	2.30	135,076,422	24,809,821
2000	2,349,361	51,159	2.18	126,095,812	24,032,595
2001 [r]	2,363,100	50,456	2.14	129,638,497	23,744,158
2002	2,389,533	28,074	1.17	105,339,413	18,841,122
2003	2,394,749	27,309	1.14	90,429,009	18,709,021
2004	2,344,354	19,294	0.82	102,077,964	22,219,722

[r] Revised or corrected.

[1] Starting with 1965, number of returns, total gross estate at date of death, and estate tax after credits are estimates based on samples. Beginning with 1982, numbers in columns 2-5 have been revised to reflect returns filed more than 3 calendar years after a decedent's death.

Selected Historical and Other Data

Table 17. Taxable Estate Tax Returns as a Percentage of Adult Deaths, Selected Years of Death, 1934-2004—Continued

Footnotes—Continued

[2] Prior to 1982, year of death figures were approximated, using data from returns filed in a single calendar year. While many of the returns filed in a given calendar year represent returns of decedents who died in the immediately preceding year, others represent returns of decedents who died in earlier years. Starting with 1982, the statistics are by year of death, using the year of death reported on the estate tax returns filed during periods of at least 3 successive years.

[3] Total adult deaths represent those of individuals age 20 and over, plus deaths for which age was unavailable.

[4] Prior to 1964, a return was taxable if it showed an estate tax before credits. Starting with 1964, the classification was based on estate tax after credits.

[5] Year-to-year comparability of the data is affected by changes in the gross estate filing threshold which is based on year of death: 1934 (\$50,000); 1935 (\$50,000 changing to \$40,000); 1936-1941 (\$40,000); 1942 (\$40,000 changing to \$60,000); 1943-1976 (\$60,000); 1977 (\$120,000); 1978 (\$134,000); 1979 (\$147,000); 1980 (\$161,000); 1981 (\$175,000); 1982 (\$225,000); 1983 (\$275,000); 1984 (\$325,000); 1985 (\$400,000); 1986 (\$500,000); 1987-1997 (\$600,000); 1998 (\$625,000); 1999 (\$650,000); 2000-2001 (\$675,000); 2002-2003 (\$1,000,000); 2004-2005 (\$1,500,000); 2006-2008 (\$2,000,000); 2009 (\$3,500,000); and 2010 (no estate tax).

NOTES: The title of this table has been changed from "Estate Tax Returns as a Percentage of Adult Deaths," in some previously published versions, to "Taxable Estate Tax Returns as a Percentage of Adult Deaths." However, the data contained in the table have not changed. Detail may not add to totals because of rounding. All amounts are in current dollars. Most of the data are subject to sampling error. Tax law and tax form changes affect the year-to-year comparability of the data.

SOURCE: Data are shown only for years for which Statistics of Income data are available. For years after 1953, *Statistics of Income—Estate Tax Returns*; *Estate and Gift Tax Returns*; or *Fiduciary, Estate, and Gift Tax Returns*, depending on the year, and *Statistics of Income Bulletin*, various issues; also unpublished tabulations for certain years. For years prior to 1954, *Statistics of Income—Part I*. Adult deaths are from the Centers for Disease Control and Prevention, National Center for Health Statistics, U.S. Department of Health and Human Services, *Vital Statistics of the United States*, Report Number 11, Supplement 2, Table 2, and *National Vital Statistics Report*, Volume 50, Number 15, Table 3, September 2002; Volume 52, Number 3, Table 3, September 2003; Volume 53, Number 5, Table 3, October 2004; and Volume 54, Number 13, Table 3, April 2006.

Selected Historical and Other Data

Table 18. Treasury Department Gross Tax Collections: Amount Collected by Quarter and Fiscal Year, 1987-2007

[Money amounts are in millions of dollars]

Quarter and fiscal year	Amount collected by type of return						
	Total [1]	Individual income taxes [2]	Corporation income taxes [3]	Excise taxes		Employment taxes [5]	Estate and gift taxes
				Internal Revenue Service [1,4]	Alcohol and Tobacco Tax and Trade Bureau [4]		
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
FISCAL YEAR 1987, TOTAL [4]	886,290	465,452	102,859	33,311	[4]	277,000	7,668
October 1986 - December 1986	180,580	92,346	22,466	8,281	N/A	55,615	1,872
January 1987 - March 1987	209,032	105,483	22,649	7,925	N/A	71,156	1,819
April 1987 - June 1987	285,477	164,008	29,748	8,493	N/A	81,139	2,089
July 1987 - September 1987 [4]	211,201	103,615	27,996	8,612	[4]	69,090	1,888
FISCAL YEAR 1988, TOTAL	945,614	473,667	109,683	25,934	10,507	318,039	7,784
October 1987 - December 1987	200,006	97,479	24,828	6,475	2,911	66,500	1,813
January 1988 - March 1988	222,784	111,215	22,006	5,304	2,337	80,161	1,761
April 1988 - June 1988	298,938	160,018	35,991	6,550	2,763	91,426	2,190
July 1988 - September 1988	223,886	104,955	26,858	7,605	2,496	79,952	2,020
FISCAL YEAR 1989, TOTAL	1,024,718	515,732	117,015	25,977	11,397	345,626	8,973
October 1988 - December 1988	216,503	104,522	29,551	6,657	2,985	70,632	2,156
January 1989 - March 1989	238,279	114,475	20,760	6,098	2,395	92,587	1,964
April 1989 - June 1989	334,878	180,947	40,825	6,899	3,401	100,077	2,729
July 1989 - September 1989	235,059	115,788	25,879	6,324	2,615	82,329	2,124
FISCAL YEAR 1990, TOTAL	1,066,600	540,228	110,017	27,139	10,235	367,219	11,762
October 1989 - December 1989	222,867	110,077	26,390	6,184	2,790	74,982	2,444
January 1990 - March 1990	251,924	127,277	21,433	5,868	2,187	92,868	2,291
April 1990 - June 1990	343,976	181,180	37,398	8,143	2,690	110,281	4,284
July 1990 - September 1990	247,833	121,694	24,796	6,944	2,568	89,088	2,743
FISCAL YEAR 1991, TOTAL	1,099,746	546,877	113,599	30,452	12,895	384,451	11,473
October 1990 - December 1990	242,792	118,047	29,248	6,363	2,753	83,646	2,735
January 1991 - March 1991	257,078	119,891	22,974	7,107	2,919	101,569	2,618
April 1991 - June 1991	338,591	181,949	35,953	7,545	3,545	106,426	3,173
July 1991 - September 1991	261,284	126,990	25,423	9,436	3,678	92,810	2,947
FISCAL YEAR 1992, TOTAL	1,134,195	557,723	117,951	33,566	13,395	400,081	11,479
October 1991 - December 1991	249,845	117,980	28,571	8,238	3,572	88,749	2,735
January 1992 - March 1992	266,984	136,220	19,751	8,159	2,823	97,425	2,606
April 1992 - June 1992	348,986	173,437	41,930	8,311	3,539	118,503	3,266
July 1992 - September 1992	268,380	130,086	27,699	8,858	3,461	95,404	2,872
FISCAL YEAR 1993, TOTAL	1,190,673	585,774	131,548	34,962	13,987	411,511	12,891
October 1992 - December 1992	262,404	124,812	30,324	8,388	3,581	92,284	3,015
January 1993 - March 1993	285,925	154,596	21,124	8,317	3,074	96,042	2,772
April 1993 - June 1993	354,070	168,977	47,920	8,739	3,776	120,767	3,891
July 1993 - September 1993	288,274	137,389	32,180	9,518	3,556	102,418	3,213
FISCAL YEAR 1994, TOTAL	1,290,246	619,819	154,205	43,005	13,779	443,831	15,607
October 1993 - December 1993	282,891	132,790	36,088	9,907	3,525	97,012	3,569
January 1994 - March 1994	309,746	160,382	24,883	9,932	3,009	108,037	3,503
April 1994 - June 1994	386,403	182,996	55,652	10,629	3,592	128,665	4,869
July 1994 - September 1994	311,205	143,651	37,582	12,536	3,653	110,117	3,666
FISCAL YEAR 1995, TOTAL	1,390,048	675,779	174,422	44,981	14,317	465,405	15,144
October 1994 - December 1994	301,238	138,454	40,811	11,029	3,791	103,537	3,616
January 1995 - March 1995	329,624	169,977	26,137	10,791	2,982	116,503	3,234
April 1995 - June 1995	432,556	214,105	65,995	11,116	3,603	133,357	4,380
July 1995 - September 1995	326,630	153,243	41,479	12,045	3,941	112,008	3,914
FISCAL YEAR 1996, TOTAL	1,500,351	745,313	189,055	42,222	13,805	492,365	17,592
October 1995 - December 1995	320,038	148,203	46,823	11,409	3,411	106,200	3,992
January 1996 - March 1996	349,683	184,419	27,971	9,939	2,959	120,783	3,612
April 1996 - June 1996	474,823	242,754	68,509	9,835	3,532	144,825	5,368
July 1996 - September 1996	355,808	169,937	45,752	11,039	3,903	120,557	4,620

Footnotes at end of table.

Selected Historical and Other Data

Table 18. Treasury Department Gross Tax Collections: Amount Collected by Quarter and Fiscal Year, 1987-2007—Continued

[Money amounts are in millions of dollars]

Quarter and fiscal year	Amount collected by type of return						
	Total [1]	Individual income taxes [2]	Corporation income taxes [3]	Excise taxes		Employment taxes [5]	Estate and gift taxes
				Internal Revenue Service [1,4]	Alcohol and Tobacco Tax and Trade Bureau [4]		
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
FISCAL YEAR 1997, TOTAL	1,637,157	825,021	204,492	44,806	13,883	528,597	20,356
October 1996 - December 1996	345,447	157,767	49,612	10,052	3,261	120,284	4,471
January 1997 - March 1997	379,827	197,477	31,359	10,762	3,052	132,838	4,339
April 1997 - June 1997	526,490	285,884	75,093	11,600	3,524	144,048	6,341
July 1997 - September 1997	385,392	183,893	48,428	12,393	4,046	131,426	5,206
FISCAL YEAR 1998, TOTAL	1,782,997	928,066	213,270	45,643	13,588	557,799	24,631
October 1997 - December 1997	381,995	180,507	56,228	12,424	3,181	124,315	5,340
January 1998 - March 1998	412,808	216,994	33,640	11,424	2,968	142,512	5,270
April 1998 - June 1998	578,540	319,050	75,714	12,575	3,581	159,632	7,988
July 1998 - September 1998	409,655	211,515	47,688	9,220	3,858	131,341	6,033
FISCAL YEAR 1999, TOTAL	1,917,643	1,002,186	216,325	58,586	13,490	598,670	28,386
October 1998 - December 1998	410,884	192,843	56,474	18,017	3,216	133,695	6,639
January 1999 - March 1999	444,224	239,680	33,958	12,179	2,915	149,408	6,084
April 1999 - June 1999	616,626	351,720	72,904	13,366	3,457	166,086	9,093
July 1999 - September 1999	445,908	217,943	52,989	15,023	3,903	149,480	6,570
FISCAL YEAR 2000, TOTAL	2,112,755	1,137,078	235,655	54,811	[r] 15,911	639,652	29,722
October 1999 - December 1999	442,745	222,369	57,122	12,611	3,523	139,310	7,810
January 2000 - March 2000	490,661	265,193	39,584	13,107	3,540	162,816	6,421
April 2000 - June 2000	690,101	403,071	79,583	13,608	4,217	180,645	8,977
July 2000 - September 2000	446,076	246,445	59,366	15,484	4,558	156,881	6,514
FISCAL YEAR 2001, TOTAL	2,144,654	1,178,210	186,732	52,419	15,822	682,223	29,248
October 2000 - December 2000	466,710	228,483	64,597	12,574	3,782	150,175	7,099
January 2001 - March 2001	523,566	285,417	38,239	13,436	3,472	176,339	6,663
April 2001 - June 2001	709,403	425,471	64,709	12,369	4,137	193,561	9,156
July 2001 - September 2001	444,976	238,839	19,187	14,040	4,531	162,148	6,331
FISCAL YEAR 2002, TOTAL	2,033,661	1,037,734	211,438	52,137	17,034	688,077	27,242
October 2001 - December 2001	477,215	235,729	71,783	8,070	3,756	151,079	6,798
January 2002 - March 2002	494,506	250,689	38,760	15,632	3,957	178,982	6,486
April 2002 - June 2002	599,650	324,735	55,496	13,486	4,480	194,045	7,408
July 2002 - September 2002	462,289	226,580	45,399	14,949	4,841	163,971	6,549
FISCAL YEAR 2003, TOTAL	1,969,648	987,209	194,146	52,771	16,719	695,976	22,827
October 2002 - December 2002	444,259	209,947	51,821	12,461	3,791	160,448	5,792
January 2003 - March 2003	480,840	252,412	31,309	12,017	3,808	175,609	5,684
April 2003 - June 2003	596,078	310,723	67,381	12,821	4,336	194,902	5,916
July 2003 - September 2003	448,471	214,128	43,636	15,473	4,783	165,016	5,435
FISCAL YEAR 2004, TOTAL	2,035,761	990,249	230,619	54,807	17,260	717,247	25,579
October 2003 - December 2003	453,910	211,414	59,746	12,613	4,243	159,894	6,000
January 2004 - March 2004	489,927	253,054	33,289	13,018	3,745	180,871	5,950
April 2004 - June 2004	612,808	308,822	81,800	13,554	4,481	197,486	6,665
July 2004 - September 2004	479,116	216,958	55,784	15,623	4,790	178,996	6,965
FISCAL YEAR 2005, TOTAL	2,286,837	1,107,501	307,095	57,252	17,942	771,442	25,606
October 2004 - December 2004	492,020	224,307	74,547	12,692	4,107	170,425	5,942
January 2005 - March 2005	531,435	271,686	43,355	13,593	3,706	192,825	6,270
April 2005 - June 2005	713,819	367,673	103,079	14,282	4,404	217,592	6,789
July 2005 - September 2005	549,564	243,835	86,114	16,685	5,725	190,600	6,604
FISCAL YEAR 2006, TOTAL	2,536,771	1,236,259	380,925	57,990	18,090	814,819	28,687
October 2005 - December 2005	531,599	240,961	89,694	13,269	4,357	176,954	6,364
January 2006 - March 2006	598,921	302,873	58,503	13,783	4,053	212,001	7,707
April 2006 - June 2006	809,903	427,823	124,945	14,903	4,727	229,789	7,716
July 2006 - September 2006	596,348	264,602	107,783	16,035	4,953	196,075	6,900
FISCAL YEAR 2007, TOTAL	2,709,798	1,366,241	395,536	53,049	18,260	849,733	26,978
October 2006 - December 2006	578,083	265,265	106,382	11,868	4,542	183,437	6,589
January 2007 - March 2007	646,419	334,516	64,686	12,511	4,068	224,649	6,989
April 2007 - June 2007	870,231	478,686	129,373	13,308	4,559	236,427	7,878
July 2007 - September 2007	615,065	287,774	95,095	15,363	5,091	205,220	6,522

Footnotes at end of table.

Selected Historical and Other Data

Table 18. Treasury Department Gross Tax Collections: Amount Collected by Quarter and Fiscal Year, 1987-2007—Continued

Footnotes

N/A - Not applicable.

[1] Includes not only taxes collected by the Internal Revenue Service (IRS) but, starting in Fiscal Year 1988 and the second quarter of Fiscal Year 1991, excise taxes

		2004	55.9	1998	63.3	1992	29.6
		2003	55.2	1997	66.9	1990	32.5
2007	49.8	2002	67.0	1995	68.5	1989	32.3
2006	50.1	2000	60.7	1994	69.7	1988	33.2
2005	53.3	1999	61.0	1993	27.7	1987	33.2

Collections of income tax of estates and trusts in fiscal years, without regard to tax year, are as follows:

Fiscal year	Billions of dollars	Fiscal year	Billions of dollars	Fiscal year	Billions of dollars	Fiscal year	Billions of dollars
		2004	10.7	1998	14.2	1992	6.1
		2003	8.4	1997	11.2	1991	4.8
		2002	10.8	1996	8.0	1990	5.9
2007	21.5	2001	17.5	1995	5.3	1989	6.0
2006	17.1	2000	16.7	1994	6.2	1988	6.5
2005	13.9	1999	14.3	1993	6.0	1987	8.4

[3] Includes various taxes collected from otherwise Federally tax-exempt corporations and trusts, mainly the "unrelated business income" tax (UBIT) imposed on organizations that engage in activities that are unrelated to their charitable purposes. Trusts with UBI are taxed at individual income tax rates; however, these taxes were combined with the corporation income tax collections when tabulated. Following are total taxes and UBIT collected from tax-exempt organizations in recent fiscal years:

Fiscal year	Total (Millions of dollars)	Unrelated business income tax	Fiscal year	Total (Millions of dollars)	Unrelated business income tax
2007	N/A	N/A	1997	666.8	484.9
2006	884.7	635.3	1996	699.9	501.9
2005	623.9	457.3	1995	484.9	294.3
2004	510.7	347.1	1994	571.5	372.4
2003	386.0	270.4	1993	342.7	173.6
2002	494.5	319.2	1992	379.5	181.6
2001	652.1	523.3	1991	288.2	155.6
2000	674.8	553.6	1990	304.0	127.9
1999	810.8	665.9	1989	271.4	115.6
1998	689.8	473.2	1988	284.0	137.5
			1987	244.3	119.9

[4] Data shown for the Alcohol and Tobacco Tax and Trade Bureau (TTB) also include data for the Customs Service. To preserve the historical time series interrupted by transferring collection of the manufacturers' excise taxes paid on alcohol and tobacco and of the manufacturers' excise taxes on recreational products for the taxes paid on firearms from IRS to TTB, starting in July 1987 and January 1991, respectively, the combined excise taxes for these two Treasury agencies are shown in Table 18 collections, for fiscal years beginning with 1988. They have also been added to the total tax collections reported by IRS to show a grand total of all Treasury Department tax alongside the IRS excise tax collections (with the exception of a cargo excise tax collected by the Customs Service). Although responsibility for the administration of alcohol and tobacco excise taxes was transferred to the Alcohol and Tobacco Tax and Trade Bureau (TTB) and the Customs Service, effective July 1, 1987, i.e., with the beginning of the fourth quarter of Fiscal Year 1987, the taxes collected were treated as Internal Revenue Service tax collections (column 4) through September 30, 1987, i.e., through the end of the fourth quarter of Fiscal Year 1987, rather than as TTB/Customs collections (column 5), as a transitional measure.

[5] Employment taxes include:

(a) Old-Age, Survivors, Disability, and Hospital Insurance (OASDHI) taxes, i.e., Social Security taxes, levied on salaries and wages (under the Federal Insurance

Contributions Act (FICA)). Amounts collected in recent fiscal years are as follows:

Fiscal year	Billions of dollars	Fiscal year	Billions of dollars	Fiscal year	Billions of dollars	Fiscal year	Billions of dollars
		2004	664.9	1998	513.9	1992	365.2
		2003	647.9	1997	484.0	1991	349.3
		2002	639.7	1996	455.2	1990	336.3
2007	787.8	2001	634.2	1995	394.4	1989	317.8
2006	757.5	2000	593.3	1994	409.6	1988	289.9
2005	716.9	1999	555.3	1993	381.1	1987	252.6

(b) Social Security taxes levied on "self-employment income" (under the Self-Employment Insurance Contributions Act (SECA)). Amounts collected in recent fiscal years are as follows:

Fiscal year	Billions of dollars	Fiscal year	Billions of dollars	Fiscal year	Billions of dollars	Fiscal year	Billions of dollars
		2004	41.2	1998	32.6	1992	24.4
		2003	37.1	1997	34.0	1991	25.5
		2002	37.1	1996	26.9	1990	21.3
2007	49.8	2001	36.3	1995	60.9	1989	19.0
2006	45.1	2000	34.6	1994	24.4	1988	17.7
2005	43.1	1999	32.2	1993	20.6	1987	14.0

Selected Historical and Other Data

Table 18. Treasury Department Gross Tax Collections: Amount Collected by Quarter and Fiscal Year, 1987-2007—Continued

Footnotes—Continued

(c) Unemployment insurance taxes (under the Federal Unemployment Tax Act (FUTA)). Amounts collected in recent fiscal years are as follows:

Fiscal year	Billions of dollars	Fiscal year	Billions of dollars	Fiscal year	Billions of dollars	Fiscal year	Billions of dollars
		2004	6.7	1998	6.5	1992	5.8
		2003	6.6	1997	6.2	1991	5.5
		2002	6.7	1996	6.0	1990	5.5
2007	7.4	2001	7.1	1995	5.8	1989	4.7
2006	7.5	2000	7.0	1994	5.6	1988	6.2
2005	6.9	1999	6.7	1993	5.6	1987	6.2

(d) Railroad Retirement (carriers) tax. Amounts collected in recent fiscal years are as follows:

Fiscal year	Billions of dollars	Fiscal year	Billions of dollars	Fiscal year	Billions of dollars	Fiscal year	Billions of dollars
		2004	4.4	1998	4.8	1992	4.4
		2003	4.4	1997	4.4	1991	4.2
		2002	4.6	1996	4.3	1990	4.2
2007	4.7	2001	4.7	1995	4.3	1989	4.1
2006	4.7	2000	4.8	1994	4.2	1988	4.3
2005	4.5	1999	4.5	1993	4.3	1987	4.2

NOTES: In general, collections represent the gross amounts before refunds and include (a) amounts paid with the tax return, (b) amounts paid prior to filing the return, as applicable (income tax withheld by employers and "estimated tax" payments), and (c) amounts paid subsequent to filing the return (chiefly the result of initial IRS administrative return processing or later examination and enforcement activities). Collections also include interest and penalties, but do not reflect any revisions to the IRS data for specific fiscal years made after the close of the fiscal year. Instead, revisions are reflected in the data for the later fiscal year in which the revision was made. However, revisions to the Alcohol and Tobacco Tax and Trade Bureau (TTB) (formerly the Bureau of Alcohol, Tobacco, and Firearms (ATF)) and Customs Service excise tax collections are treated differently. See the "Notes" to Table 21. Collection statistics reported by the Internal Revenue Service are not altogether comparable to those published by the Financial Management Service, also in the Treasury Department, because of timing differences resulting from the definitions each agency uses. The Internal Revenue Service counts the monies as they are received (to reflect the status of its tax collection operation); the Financial Management Service counts these amounts as received, but only after discrepancies (such as between what the employer reports as tax withheld and the amount actually withheld) are resolved. Also, the Financial Management Service classifies the tax collected according to the Federal Budget account to which the tax receipts are assigned. For purposes of Table 18 (and to facilitate comparisons with Table 21), the grand totals of all excise taxes were obtained by accumulating data from the Treasury Monthly Statement. See also the citation under "Source," below. Totals for excise taxes collected by IRS were then subtracted from these grand totals to derive the combined totals shown as having been collected by the TTB and the Customs Service. This subtraction is not precise because of definitional differences between the two agencies. Detail may not add to totals because of rounding. All amounts are in current dollars. Tax law and tax form changes affect the year-to-year comparability of the data.

SOURCE: U.S. Department of the Treasury, Internal Revenue Service, *Internal Revenue Service Data Book* and Chief Financial Officer, Office of Finance, Revenue Accounting Division, Office of Revenue Systems; and Financial Management Service, Monthly Statement on Receipts and Outlays of the United States Government, monthly.

Selected Historical and Other Data

Table 19. Internal Revenue Tax Refunds: Amount Refunded by Quarter and Fiscal Year, 1987-2007

[Money amounts are in millions of dollars]

Quarter and fiscal year	Amount refunded by type of return					
	Total [1]	Individual income taxes [2]	Corporation income taxes [3]	Excise taxes [1,4]	Employment taxes [5]	Estate and gift taxes
	(1)	(2)	(3)	(4)	(5)	(6)
FISCAL YEAR 1987, TOTAL	96,969	73,583	19,891	1,381	1,900	214
October 1986 - December 1986	8,668	3,406	4,789	111	312	50
January 1987 - March 1987	28,422	22,198	5,296	479	393	56
April 1987 - June 1987	50,063	42,858	5,948	332	869	57
July 1987 - September 1987	9,816	5,121	3,858	459	326	52
FISCAL YEAR 1988, TOTAL	94,480	74,399	16,477	1,114	2,263	227
October 1987 - December 1987	7,701	3,437	3,727	207	275	55
January 1988 - March 1988	27,798	21,744	5,248	198	553	55
April 1988 - June 1988	49,202	43,769	3,848	421	1,114	50
July 1988 - September 1988	9,776	5,449	3,654	288	321	67
FISCAL YEAR 1989, TOTAL	93,613	73,597	14,921	2,054	2,771	269
October 1988 - December 1988	8,380	3,362	4,461	118	359	80
January 1989 - March 1989	32,041	26,759	4,462	182	570	67
April 1989 - June 1989	43,538	38,895	3,849	350	381	63
July 1989 - September 1989	9,654	4,581	2,149	1,404	1,461	59
FISCAL YEAR 1990, TOTAL	99,656	76,065	18,324	2,261	2,677	329
October 1989 - December 1989	8,487	3,094	4,605	300	409	79
January 1990 - March 1990	37,121	31,367	4,922	342	423	67
April 1990 - June 1990	43,308	36,952	4,209	549	1,492	106
July 1990 - September 1990	10,740	4,652	4,588	1,070	353	77
FISCAL YEAR 1991, TOTAL	104,380	82,877	17,440	1,188	2,471	404
October 1990 - December 1990	8,284	3,367	4,148	344	323	102
January 1991 - March 1991	38,020	32,811	4,286	293	538	92
April 1991 - June 1991	47,962	41,638	4,748	226	1,249	101
July 1991 - September 1991	10,114	5,061	4,258	325	361	109
FISCAL YEAR 1992, TOTAL	113,108	88,624	19,688	1,997	2,398	401
October 1991 - December 1991	10,072	3,607	5,639	379	346	101
January 1992 - March 1992	44,657	38,183	5,750	201	430	93
April 1992 - June 1992	47,817	42,231	4,596	476	399	115
July 1992 - September 1992	10,562	4,603	3,703	941	1,223	92
FISCAL YEAR 1993, TOTAL	93,580	74,234	16,035	958	1,969	384
October 1992 - December 1992	7,891	3,081	4,190	208	324	88
January 1993 - March 1993	37,213	31,503	4,971	239	396	104
April 1993 - June 1993	39,325	35,353	3,195	290	397	90
July 1993 - September 1993	9,151	4,297	3,679	221	852	102
FISCAL YEAR 1994, TOTAL	96,980	75,935	16,251	1,877	2,477	441
October 1993 - December 1993	7,329	2,322	4,176	394	324	113
January 1994 - March 1994	34,614	27,859	5,800	403	445	107
April 1994 - June 1994	43,804	40,876	2,109	333	393	93
July 1994 - September 1994	11,233	4,878	4,165	747	1,315	128
FISCAL YEAR 1995, TOTAL	108,035	84,056	19,350	2,223	1,972	434
October 1994 - December 1994	9,086	3,440	4,909	319	304	114
January 1995 - March 1995	35,791	27,642	6,370	926	753	101
April 1995 - June 1995	53,388	47,433	4,904	500	443	108
July 1995 - September 1995	9,770	5,541	3,167	478	472	111
FISCAL YEAR 1996, TOTAL	132,710	107,361	19,201	2,075	3,584	489
October 1995 - December 1995	11,149	4,133	5,391	361	1,152	112
January 1996 - March 1996	48,625	41,633	6,103	239	538	112
April 1996 - June 1996	61,612	56,319	4,363	355	454	121
July 1996 - September 1996	11,324	5,276	3,344	1,120	1,440	144

Footnotes at end of table.

Selected Historical and Other Data

Table 19. Internal Revenue Tax Refunds: Amount Refunded by Quarter and Fiscal Year, 1987-2007—Continued

[Money amounts are in millions of dollars]

Quarter and fiscal year	Amount refunded by type of return					
	Total [1]	Individual income taxes [2]	Corporation income taxes [3]	Excise taxes [1,4]	Employment taxes [5]	Estate and gift taxes
	(1)	(2)	(3)	(4)	(5)	(6)
FISCAL YEAR 1997, TOTAL	142,599	113,083	24,046	1,790	3,104	576
October 1996 - December 1996	13,306	4,460	8,082	155	433	176
January 1997 - March 1997	58,345	51,442	5,771	493	552	87
April 1997 - June 1997	57,421	51,980	4,399	375	522	146
July 1997 - September 1997	13,525	5,201	5,794	767	1,596	167
FISCAL YEAR 1998, TOTAL	153,828	119,499	27,560	1,600	4,562	609
October 1997 - December 1997	10,680	4,369	5,496	165	499	151
January 1998 - March 1998	66,516	56,124	9,326	266	670	130
April 1998 - June 1998	59,172	52,613	5,506	188	683	182
July 1998 - September 1998	17,460	6,393	7,232	981	2,708	146
FISCAL YEAR 1999, TOTAL	185,282	146,406	34,062	1,690	2,470	654
October 1998 - December 1998	15,684	5,010	9,885	143	455	191
January 1999 - March 1999	77,493	65,467	10,648	508	741	129
April 1999 - June 1999	76,729	68,418	7,139	369	646	157
July 1999 - September 1999	15,376	7,511	6,390	670	628	177
FISCAL YEAR 2000, TOTAL	195,751	157,837	30,382	1,802	4,957	773
October 1999 - December 1999	16,453	6,590	8,844	176	613	230
January 2000 - March 2000	94,728	84,290	8,933	539	791	175
April 2000 - June 2000	67,353	59,386	6,625	388	773	181
July 2000 - September 2000	17,217	7,571	5,980	699	2,780	187
FISCAL YEAR 2001, TOTAL	252,787	205,690	37,941	1,948	6,283	925
October 2000 - December 2000	17,859	6,685	10,148	232	549	245
January 2001 - March 2001	102,741	87,193	13,984	468	897	199
April 2001 - June 2001	75,813	66,964	7,409	465	789	186
July 2001 - September 2001	56,374	44,848	6,400	783	4,048	295
FISCAL YEAR 2002, TOTAL	257,644	183,891	66,758	2,248	3,944	803
October 2001 - December 2001	26,567	8,665	16,659	321	700	222
January 2002 - March 2002	94,761	76,571	16,658	545	821	166
April 2002 - June 2002	107,211	87,192	18,498	625	668	228
July 2002 - September 2002	29,105	11,463	14,942	758	1,754	188
FISCAL YEAR 2003, TOTAL	296,064	223,317	65,332	2,026	4,445	944
October 2002 - December 2002	32,964	11,292	20,580	215	609	268
January 2003 - March 2003	126,113	105,124	19,587	526	685	191
April 2003 - June 2003	98,530	81,958	14,958	607	789	217
July 2003 - September 2003	38,457	24,943	10,207	677	2,362	268
FISCAL YEAR 2004, TOTAL	270,893	218,667	45,850	1,955	3,638	783
October 2003 - December 2003	30,851	10,930	18,913	220	562	226
January 2004 - March 2004	127,181	116,146	9,528	580	755	172
April 2004 - June 2004	92,443	81,049	10,062	499	646	188
July 2004 - September 2004	20,418	10,542	7,347	656	1,675	198
FISCAL YEAR 2005, TOTAL	255,439	212,966	34,332	2,132	5,126	883
October 2004 - December 2004	24,050	10,242	12,911	184	483	229
January 2005 - March 2005	126,559	116,060	8,530	576	1,185	207
April 2005 - June 2005	83,244	76,170	5,578	597	700	200
July 2005 - September 2005	21,586	10,494	7,313	774	2,758	246
FISCAL YEAR 2006, TOTAL [6]	265,003	227,240	29,831	2,163	4,918	851
October 2005 - December 2005	21,173	10,248	9,863	262	591	210
January 2006 - March 2006	142,565	131,626	9,484	508	786	161
April 2006 - June 2006	76,231	70,181	4,372	686	713	278
July 2006 - September 2006	25,034	15,185	6,112	706	2,827	202
FISCAL YEAR 2007, TOTAL	279,173	235,645	27,340	3,527	11,691	1,467
October 2006 - December 2006	23,490	7,964	7,960	439	6,816	311
January 2007 - March 2007	153,223	140,744	10,097	1,396	769	217
April 2007 - June 2007	84,376	77,836	4,362	797	1,151	229
July 2007 - September 2007	18,084	9,101	4,921	896	2,954	710

Footnotes at end of table.

Selected Historical and Other Data

Table 19. Internal Revenue Tax Refunds: Amount Refunded by Quarter and Fiscal Year, 1987-2007—Continued

Footnotes

- [1] Even though the Alcohol and Tobacco Tax and Trade Bureau (TTB) and the Customs Service have had responsibility for collecting and refunding excise taxes on alcohol and tobacco since July 1987 and for excise taxes on firearms since January 1991, the Internal Revenue Service (IRS) continues to be responsible for recording refunds of these taxes. Consequently, IRS statistics for excise tax refunds include refunds made by TTB and the Customs Service in years subsequent to the dates on which organizational responsibility was transferred. In contrast, TTB and Customs Service excise tax collections are recorded by these two Treasury agencies and are, therefore, shown separately in Table 18 under the heading, Alcohol and Tobacco Tax and Trade Bureau. See also footnote 4.
- [2] Includes special statutory refunds and refunds of taxes paid on the "unrelated business income" of certain tax-exempt trusts. Also, to preserve the year-to-year comparability of the historical series, individual income tax refund data have been revised, as necessary, starting with 1996, to include net refunds due to the "earned income credit" in addition to overpayment and other refunds. This credit is already reflected in the refund statistics for previous years. Therefore, refund data may not always agree with those presented in the annual *Internal Revenue Service Data Book*, for certain years starting with 1996, although, conceptually, they agree with refund data published in the Treasury Department's *Monthly Statement of Receipts and Outlays of the United States Government*. See also the citation under "Source," below. Individual income tax refunds are net of offsets under laws that require the Department of the Treasury to act as collecting agent for delinquent payments owed various U.S. Government agencies under specific programs. See Table 20 (which, however, is by calendar year rather than by fiscal year).
- [3] Includes refunds of taxes on the "unrelated business income" of tax-exempt organizations, except for certain trusts.
- [4] See footnote 1. Also, as further explained in the "Notes" to Table 21, taxpayers can offset certain refundable excise tax payments against the tax of subsequent time periods and claim certain other refunds as a credit against income tax; however, these amounts are not reflected in the excise tax refund statistics.
- [5] The kinds of employment taxes subject to refund are listed in Table 18, footnote 5.
- [6] Certain money amounts from this table were originally incorrectly reported starting with the first quarter of Fiscal Year 2006. A portion of estate and partnership refunds were excluded in the calculations for Individual Income Tax Returns, Amount Refunded by Fiscal Quarter. These amounts have been corrected above.

NOTES: Detail may not add to totals because of rounding. Tax law and tax form changes affect the year-to-year comparability of the data. All amounts are in current dollars. Refund data include interest paid on the refunds by IRS or the Alcohol and Tobacco Tax and Trade Bureau (TTB) (formerly the Bureau of Alcohol, Tobacco, and Firearms (ATF)) as shown below. See also the "Notes" to Table 18.

Fiscal year	Total	Individuals (Billions of dollars)	Corporations	Fiscal year	Total	Individuals (Billions of dollars)	Corporations
2006	3.6	0.6	2.8	1996	2.2	0.3	1.6
2005	6.1	0.5	5.5	1995	2.7	0.4	1.7
2004	5.1	0.4	4.6	1994	3.1	0.3	2.3
2003	3.3	0.5	2.6	1993	2.1	0.4	1.6
2002	4.2	0.6	3.4	1992	3.2	0.4	2.1
2001	2.7	0.5	2.0	1991	2.8	0.5	2.0
2000	2.6	0.6	2.0	1990	2.4	0.5	1.4
1999	2.7	0.4	2.2	1989	1.8	0.5	n.a.
1998	2.6	0.3	2.1	1988	1.7	0.4	n.a.
1997	2.4	0.4	1.8	1987	2.0	0.4	n.a.

SOURCE: U.S. Department of the Treasury, Internal Revenue Service, *Internal Revenue Service Data Book* and Chief Financial Officer, Office of Finance, Revenue Accounting Division, Office of Revenue Systems.

Selected Historical and Other Data

Table 20. Federal Excise Taxes Reported to or Collected by the Internal Revenue Service, Alcohol and Tobacco Tax and Trade Bureau, and Customs Service, by Type of Excise Tax, Fiscal Years 2001-2007

[Money amounts are in thousands of dollars]

Type of excise tax by agency to which tax was reported or paid	Fiscal year						
	2001	2002	2003	2004	2005	2006	2007
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Total excise tax collections	70,648,000	68,241,000	69,171,000	69,490,000	71,781,000	76,080,000	71,310,000
Excise tax collections or liabilities reported by the Internal Revenue Service [1]							
Total excise tax collections	54,810,038	52,418,848	52,136,835	52,771,160	54,807,225	57,989,543	53,049,612
Retail excise taxes:							
Luxury taxes:							
Passenger vehicles (expired, January 1, 2003)	407,222	341,981	252,834	65,162	3,032	-465	568
Boats (repealed, January 1, 1993)	0	19	0	0	0	0	0
Aircraft (repealed, January 1, 1993)	0	0	0	0	0	0	0
Jewelry (repealed, January 1, 1993)	0	0	0	0	0	2	0
Furs (repealed, January 1, 1993)	0	1	0	0	0	0	0
Dyed diesel fuel used in trains:							
Total, excluding floor stocks	170,960	167,161	147,408	162,654	127,169	61,097	-21,096
Floor stocks	0	0	1	0	1	0	1
Dyed diesel fuel for certain intercity or local buses	2,317	2,380	1,731	1,266	1,139	-3,386	-1,305
Dyed diesel	N/A	N/A	N/A	N/A	N/A	-20,205	22,065
Dyed kerosene	N/A	N/A	N/A	N/A	N/A	-601	331
Special motor fuels:							
Total, excluding floor stocks	19,535	18,404	17,570	14,226	12,990	-10,764	590
Floor stocks	-1	0	0	0	0	0	0
Compressed natural gas	1,145	1,026	895	1,735	1,406	1,216	366
Alcohol fuels [2]	807	5,462	408	-9,986	7,367	-2,053	6,869
Fuels used commercially on inland waterways	118,666	114,110	111,311	111,058	110,364	99,125	90,257
Truck, trailer, and semitrailer chassis and bodies, and tractors	2,775,788	1,573,968	1,574,947	1,608,208	2,235,178	3,549,821	2,871,157
Manufacturer's excise taxes:							
Gas guzzlers [2]	70,788	78,157	79,705	126,685	140,834	201,671	178,690
Highway-type tires [2]	420,299	354,769	372,800	403,892	433,116	44,769	-89,796
Tires other than Biasply or Super Single [3]	N/A	N/A	N/A	N/A	N/A	419,773	503,185
Biasply or Super Single tires [3]	N/A	N/A	N/A	N/A	N/A	25,717	19,712
Super Single tires for steering [3]	N/A	N/A	N/A	N/A	N/A	3,641	750
Aviation gasoline [4]	58,472	49,687	62,574	57,953	44,611	40,694	44,183
Gasoline except for use in gasohol:							
Total, excluding floor stocks	21,040,777	20,619,195	20,942,138	20,169,608	18,232,507	25,517,830	25,772,347
Floor stocks	2	-21	2	0	0	0	0
Diesel fuel, except for trains and intercity buses:							
Total, excluding floor stocks [2]	8,229,762	8,208,994	8,214,559	8,581,467	9,016,694	9,595,301	9,766,771
Floor stocks	-133	0	0	0	0	0	0
Diesel-water fuel emulsion	N/A	N/A	N/A	N/A	N/A	79	-95
Kerosene for use in aviation	N/A	N/A	N/A	N/A	N/A	4,028	7,920
Floor stocks	N/A	N/A	N/A	N/A	N/A	2	0
Other exempt fuels	N/A	N/A	N/A	N/A	N/A	1,109	1,130
Alternative fuel:							
Liquid petroleum gas	N/A	N/A	N/A	N/A	N/A	N/A	13,339
Biodiesel fuel, not used as fuel	N/A	N/A	N/A	N/A	N/A	N/A	2
P series fuel	N/A	N/A	N/A	N/A	N/A	N/A	-81
Compressed natural gas	N/A	N/A	N/A	N/A	N/A	N/A	4,476
Liquefied hydrogen	N/A	N/A	N/A	N/A	N/A	N/A	0
Liquefied fuel derived from coal	N/A	N/A	N/A	N/A	N/A	N/A	0
Liquefied hydrocarbons—biomass	N/A	N/A	N/A	N/A	N/A	N/A	10
Liquefied natural gas	N/A	N/A	N/A	N/A	N/A	N/A	2,042
Gasoline for use in gasohol by alcohol content:							
Total, excluding floor stocks:							
5.7 percent under 7.7 percent	65	9	77	2,320	15,436	-43	11
7.7 percent under 10 percent	4,266	4,839	4,835	946	503	0	0
10 percent or more	265,273	243,702	302,407	358,002	306,441	43,096	0
Floor stocks	0	1	-1	0	0	0	0
Gasohol by alcohol content:							
Total, excluding floor stocks:							
5.7 percent under 7.7 percent	25,934	297,763	406,578	1,296,991	2,363,320	738	-16,521
7.7 percent under 10 percent	59,104	146,196	176,148	91,017	97,098	15	-2,552
10 percent or more	2,039,428	1,918,995	1,932,347	2,313,542	2,899,287	-1,055	-417
Floor stocks	0	-4	0	0	0	0	0

Footnotes at end of table.

Selected Historical and Other Data

Table 20. Federal Excise Taxes Reported to or Collected by the Internal Revenue Service, Alcohol and Tobacco Tax and Trade Bureau, and Customs Service, by Type of Excise Tax, Fiscal Years 2001-2007—Continued

[Money amounts are in thousands of dollars]

Type of excise tax by agency to which tax was reported or paid	Fiscal year						
	2001	2002	2003	2004	2005	2006	2007
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Manufacturer's excise taxes—continued:							
Aviation-grade kerosene (except gasoline) for noncommercial use:							
Total, excluding floor stocks	187,318	287,664	286,559	322,440	1,027,883	-520,516	-103,816
Floor stocks	0	0	0	0	0	10	0
Aviation-grade kerosene (except gasoline) for commercial use (other than foreign trade):							
Floor stocks	620,044	509,944	453,361	503,696	-98,244	451,933	450,686
	0	0	0	0	0	-319	-3
Kerosene (effective July 1, 1998)	90,331	62,857	72,128	62,085	52,802	1,064,457	992,408
Coal:							
Mined underground:							
At 4.4 percent of sales price	183,531	155,966	134,588	125,536	85,816	54,235	38,297
At \$1.10 per ton	135,189	149,366	147,646	194,585	261,097	275,638	299,701
Surface mined:							
At 4.4 percent of sales price	90,122	103,502	109,537	120,012	134,071	136,097	159,641
At \$0.55 per ton	140,004	139,634	125,760	127,877	131,451	141,911	153,755
Certain vaccines [2]	152,349	161,764	179,009	171,471	196,426	254,752	336,671
Sport fishing equipment	100,642	97,901	97,986	103,339	101,563	79,127	84,855
Fishing tackle boxes	0	0	0	0	617	1,294	1,342
Electric outboard motors, sonar devices	2,477	2,725	2,585	3,240	2,358	2,719	3,104
Fishing rods and poles	N/A	N/A	N/A	N/A	N/A	17,140	24,384
Bows and arrows	19,094	20,297	20,947	22,058	23,881	26,541	28,017
Arrow shafts	0	0	0	0	1,905	5,980	8,033
Taxes on facilities and services:							
Telephone and teletypewriter services	5,737,027	5,803,631	5,809,503	5,792,246	5,851,530	4,607,881	739,840
Transportation of persons by air	6,670,357	6,157,264	6,185,415	6,675,981	7,047,808	7,696,481	8,017,578
Use of international air travel facilities	1,450,458	1,406,192	1,452,015	1,609,445	1,881,355	1,977,189	2,229,119
Transportation of property by air	400,286	372,119	455,209	483,691	477,826	517,011	527,989
Taxes on policies issued by foreign insurers	152,221	195,634	292,897	350,790	373,580	403,083	427,637
Taxes related to wagering:							
Certain wagers [2]	[5]	[5]	[5]	[5]	[5]	[5]	[5]
Occupational taxes [2]	[5]	[5]	[5]	[5]	[5]	[5]	[5]
Certain other excise taxes:							
Passenger transportation by water	27,919	31,069	33,252	34,721	36,083	36,444	36,841
Use tax on heavy vehicles [1,2]	867,345	899,367	911,445	[r] 934,073	1,327,257	1,083,888	1,076,306
Environmental taxes:							
Domestic petroleum (Superfund) (expired effective January 1, 1996)	14	-4	1	-21	2	0	3
Imported petroleum (Superfund) (expired effective January 1, 1996)	337	641	-4	-11	0	-564	0
Domestic petroleum (Oil Spill Liability Trust Fund) (expired effective January 1, 1995), reinstated April 1, 2006	6	0	0	-4	0	74,670	129,126
Imported petroleum (Oil Spill Liability Trust Fund) (expired effective January 1, 1995), reinstated April 1, 2006	0	0	0	-3	0	100,009	210,612
Certain chemicals (Superfund) (expired effective January 1, 1996) [2]	-2,258	-2,842	-687	-52	1	725	9
Certain imported substances (Superfund) (expired effective January 1, 1996) [2]	-492	-7	0	-1	0	0	0
Ozone-depleting chemicals: [2]							
Total, excluding floor stocks	12,076	3,995	7,519	1,457	1,766	684	1,928
Floor stocks	1,313	1,182	905	934	506	166	-238
Imported taxable products containing or manufactured using ozone-depleting chemicals [2]	11,978	-945	6,869	4,352	9,296	6,914	5,815

Footnotes at end of table.

Selected Historical and Other Data

Table 20. Federal Excise Taxes Reported to or Collected by the Internal Revenue Service, Alcohol and Tobacco Tax and Trade Bureau, and Customs Service, by Type of Excise Tax, Fiscal Years 2001-2007—Continued

[Money amounts are in thousands of dollars]

Type of excise tax by agency to which tax was reported or paid	Fiscal year						
	2001	2002	2003	2004	2005	2006	2007
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Taxes on Private Foundations:							
Net investment income [6]	720,047	490,425	262,662	240,508	384,554	505,560	650,296
Additional excise taxes [7]	3,072	4,520	5,059	4,498	7,405	4,209	3,632
Taxes on Black Lung Benefit Trusts [2]	-1	0	0	0	0	0	0
Taxes on qualified pension and other plans:							
Failure to meet minimum funding standards.	652	1,851	54	3	0	0	0
Nondeductible contributions	12,145	-25	6	0	0	0	0
Excess contributions to Individual Retirement Accounts and others	[5]	[5]	[5]	[5]	[5]	[5]	[5]
Prohibited transactions	1,091	207	1,476	5	0	0	0
Certain excess contributions	542	34	17	-18	0	0	0
Reversion of qualified plan assets to employer	2,127	175	80	0	0	0	0
Penalties [2]	3,958	1,887	2,446	0	0	0	0
Taxes on undistributed income of qualified investment entities:							
Real Estate Investment Trusts	249	73	152	0	0	0	0
Regulated Investment Companies	6,068	1,872	3,892	0	0	0	0
Windfall profits tax on domestic crude oil (repealed August 23, 1988) [1]	0	0	0	0	0	0	0
Miscellaneous IRS taxes [2]	131,718	106,214	35,543	104	0	0	0
Unclassified [8]	335,652	369,406	318,582	869,695	-359,285	3,601,836	16,522,228
Excise tax collections or liabilities reported by the Customs Service and the Alcohol and Tobacco Tax and Trade Bureau							
Total excise tax collections	15,822,152	17,034,165	16,718,840	16,973,775	17,941,902	18,090,457	18,260,388
Tax liabilities by type of excise tax [9]	15,771,195	16,989,022	16,678,051	16,953,918	16,974,462	17,129,530	17,168,136
Distilled spirits:							
Domestic	3,004,527	3,138,705	3,132,577	3,220,871	3,315,979	3,394,605	3,444,244
Imported	892,230	901,173	982,016	1,074,631	1,135,410	1,235,347	1,284,421
Wine:							
Domestic	498,537	513,559	534,927	547,505	566,816	574,707	589,377
Imported	168,675	193,737	215,803	220,386	239,976	258,932	284,837
Beer:							
Domestic	3,171,384	3,236,231	3,189,580	3,218,708	3,192,447	3,213,017	3,198,167
Imported	383,793	414,895	415,280	441,713	450,723	499,993	546,833
Tobacco products: [10]							
Domestic [10]	7,120,255	7,879,499	7,435,391	7,440,242	7,408,184	7,350,661	7,194,030
Cigarettes [10]	7,012,908	7,646,535	7,293,490	7,250,838	7,166,885	7,080,229	6,924,510
Cigars [10]	114,615	139,618	154,261	171,461	189,745	198,219	204,176
Papers/tubes [10]	929	954	1,018	1,374	3,614	223	54
Chewing tobacco and snuff [10]	43,571	49,504	52,094	53,387	54,085	56,313	58,404
Pipe/roll-your-own tobacco [10]	14,141	15,478	18,236	17,790	20,125	21,687	22,148
Floor stocks	528	115,835	1,628	0	10	638	0
Imported	252,229	404,308	475,278	470,017	429,077	351,471	336,521
Firearms and ammunition	175,959	205,025	193,420	214,987	225,817	248,727	287,060
Special occupations	103,606	101,890	103,779	94,053	10,191	2,796	2,646
Alcohol and Tobacco Tax and Trade Bureau and Customs Service collections less reported amounts	50,957	45,143	40,789	19,857	967,440	960,927	1,093,357
Total collections less reported amounts	50,957	45,143	40,789	19,857	967,440	960,927	1,093,357

N/A—Not applicable.

[1] Tax "liability" statistics also include "collections" of the use tax on heavy highway vehicles and of the "crude oil windfall profit tax." See also the "Notes" below.

[2] Represents aggregates for two or more specific taxes for which amounts have either been combined or are not available separately.

[3] As of June 2006, taxable tires have been divided into three taxable types: taxable tires other than Biasply or Super Single tires; taxable tires, Biasply, or Super Single tires (other than Super Single tires designed for steering); and taxable tires, Super Single tires designed for steering.

[4] This tax is in addition to the regular tax on gasoline.

Selected Historical and Other Data

Table 20. Federal Excise Taxes Reported to or Collected by the Internal Revenue Service, Alcohol and Tobacco Tax and Trade Bureau, and Customs Service, by Type of Excise Tax, Fiscal Years 2001-2007—Continued

Footnotes—Continued

- [5] Data for this and certain other taxes are combined and included in the totals for excise taxes "unclassified," shown below in Table 20. Data for the specific taxes were not separately tabulated.
- [6] Based on information obtained from Forms 990-PF as recorded by the Tax Exempt/Government Entities Returns Inventory and Control System (RICS). Excludes data from nonexempt charitable trusts and foreign private foundations that file Form 990-PF.
- [7] Based on information obtained from Forms 4720 as recorded by the Tax Exempt/Government Entities Returns Inventory and Control System (RICS). Includes data for initial taxes on self-dealing, required distributions, excess business holdings, jeopardizing investments, and taxable expenditures as reported on Forms 4720 filed by organizations, other than nonexempt charitable trusts, that were also required to file Form 990-PF.
- [8] Includes excise taxes collected through the Federal Tax Deposit (FTD) system, which the Internal Revenue Service had not yet classified by type of excise tax. Classification is based on returns filed in the quarter following tax payment. Negative amounts for "unclassified" taxes result from subsequent classification of the previously unclassified taxes. See also the "Notes," below.
- [9] Tax "liability" statistics shown for the Customs Service/Alcohol and Tobacco Tax and Trade Bureau (TTB) include tax "collections" on imported items for which the Customs Service is responsible. See also the "Notes," below.
- [10] Taxes shown for the different types of domestic tobacco products are before postfiling tax adjustments. Therefore, the statistics by type of tax for domestic tobacco products will not add to the total tax on domestic tobacco products, which is after these adjustments. For additional information, see the "Notes," below, under "Statistics on Excise Taxes Administered by the Alcohol and Tobacco Tax and Trade Bureau (TTB) and the Customs Service."

NOTES: Grand totals for taxes shown for the Internal Revenue Service (IRS), the Alcohol and Tobacco Tax and Trade Bureau (TTB) (formerly the Bureau of Alcohol, Tobacco, and Firearms [ATF]), and the Customs Service represent tax "collections." (Fees for the Harbor Maintenance tax treated as excise taxes under the Internal Revenue Code are also collected by the Customs Service, but are excluded from Table 20 for consistency with the excise tax definitions and totals published in the Federal Budget.) For the grand totals, collections rounded to millions of dollars are all that are available. In general, amounts shown are the gross amounts, i.e., before refunds. However, as explained below, refunds are sometimes claimed as a credit against the tax reported on the excise tax return of a subsequent quarter so that, to this extent, the data are after refunds. "Floor stocks taxes" are shown separately in Table 20 because they are nonrecurring. They are generally imposed on holders of inventories on the date a new excise tax is imposed or a tax rate increased. Total collections represent tax payments made during the indicated fiscal year (or quarter), either through: (a) the semimonthly tax deposits required of most taxpayers with significant excise tax liabilities using Federal Tax Deposit (FTD) coupons, in the case of taxes collected by IRS, or Electronic Funds Transfers (EFTs), in the case of taxes collected by TTB/Customs, or (b) payments attached to quarterly excise tax returns. Statistics for both the total for taxes administered by the IRS and the taxes by type of tax represent tax "collections" (see below). Also, statistics on the types of tax take into account the normal lag that exists between the time most taxes are collected (through FTDs, the means by which most excise taxes are collected) and the recording of tax liabilities by type of tax as reported on excise tax returns and "certified" by IRS, as described below. For additional information, see the notes to Table 21, *Statistics of Income Bulletin*, Fall 1998, Volume 18, Number 2, and also, "Federal Excise Taxes, Fiscal Years 1994 and 1995," Fall 1996, Volume 16, Number 2.

a. Statistics on excise taxes administered by the Internal Revenue Service: Corrections to the IRS data are reflected in the quarter(s) and year in which the corrections were made, rather than in the data for the quarter(s) and year in which the original tax liability arose (unlike the TTB/Customs data). The certified tax is net of refund credits reported on excise tax returns, not only for this reason, but for conformity with the Internal Revenue Code. As examples, tax can be offset for commodities exported that were previously taxed (exports are usually nontaxable), or for the sale of previously-taxed gasoline to a State or local government (or, in the case of TTB taxes, for alcohol used for a nonbeverage purpose). Other taxpayers apply directly for refunds and, for some of the taxes, are allowed to claim refunds by means of a credit against income tax. Because such refundable amounts were not reported on the excise tax return, they are not reflected in the Table 21 totals. (Other corrections to the IRS data for certain specific taxes are assumed to be due to misclassification and have been adjusted for as additions (or subtractions) to "Unclassified IRS taxes.")

b. Statistics on excise taxes administered by the Alcohol and Tobacco Tax and Trade Bureau (TTB) and the Customs Service: Excise taxes on alcoholic beverages and tobacco products are collected by both Customs Service (on imports) and TTB (on domestic production). Taxes on firearms and certain occupational taxes are also collected by TTB. So, TTB statistics represent tax "collections" on domestic alcohol and tobacco productions, as well as tax "collections" on firearms and certain occupations. By contrast, the tax statistics for the detailed types of taxes on domestic tobacco products are tax "liabilities." The grand totals for TTB and Customs Service tax "collections," as presented in Table 21, are residual amounts. They were derived by subtracting total IRS tax collections, which are available before most refunds, from the grand total of all excise tax gross collections reported in the *Monthly Treasury Statement*, rounded to millions of dollars, as shown at the beginning of Table 21. This subtraction is not precise because of definitional differences between IRS and TTB or Customs Service. In Table 21, TTB data have been rearranged so that tax liabilities are matched with tax collections in that same quarter. Previously, tax liabilities arising in a given quarter were not directly related to reported tax collections during that same quarter. Also, as previously noted, TTB amounts are often revised slightly as late returns are processed or postfiling adjustments are made to the tax. As a result, tax reported for prior periods is updated on a continuing basis, although the updated prior-year collections data are actually retabulated only for the one, most recent, prior year. Retabulated postfiling tax revisions for these earlier years are included for the first time in Table 21 of the spring 2002 issue of the *Bulletin* and affect previously published data for fiscal years, beginning with 1996.

However, as stated in footnote 11, above, postfiling revisions to the data for the immediately preceding fiscal year are not available for the detailed types of taxes on domestic tobacco products. Therefore, because revisions are available and are reflected in the total presented as the sum of these taxes, adding up the (unrevised) detail by type of tax will not yield the (revised) total. Detail may not add to totals because of rounding. All amounts are in current dollars. Tax law and tax form changes affect the year-to-year comparability of the data.

SOURCE: U.S. Department of the Treasury, Financial Management Service, *Monthly Treasury Statement of Receipts and Outlays of the United States Government*; Alcohol and Tobacco Tax and Trade Bureau, Statistical Release: Alcohol, Tobacco and Firearms Tax Collections, quarterly (this release also includes data for the Customs Service), and previously unpublished special tabulations; *Internal Revenue Service, Internal Revenue Service Data Book*, and its predecessor, *Annual Report*, Commissioner and Chief Counsel, Internal Revenue Service; also Chief Financial Officer, Office of Finance, Revenue Accounting Division, Office of Revenue Systems, Internal Revenue Report of Excise Taxes. Also see Francis, Brian D., "Federal Excise Taxes, Including the Slow Death of Expired Taxes, *Statistics of Income Bulletin*, Summer 1999, Volume 19, Number 1. Also see Henry, Eric, "Excise Taxes and the Airport and Airway Trust Fund, 1970-2002," *Statistics of Income Bulletin*, Winter 2003-2004, Volume 23, Number 3. For additional information about the process used to match quarterly excise tax "collections" with excise tax "liabilities" as reported on quarterly excise tax returns, see the "Notes" to Table 20 in the fall 1998 (Volume 18, Number 2) issue of the *Statistics of Income Bulletin*.

Selected Historical and Other Data

Table 21. Selected Returns and Forms Filed or To Be Filed by Type During Specified Calendar Years, 1990-2007

Type of return or form	Number filed in calendar year—					
	1990	1995	1998	1999	2000	2001
	(1)	(2)	(3)	(4)	(5)	(6)
Individual income [1]	112,596,000	116,466,900	123,049,600	125,389,700	127,657,400	130,094,300
Forms 1040, 1040A, 1040EZ, and 1040PC	112,305,000	116,059,700	122,546,900	124,887,100	127,097,200	129,444,900
Paper returns	108,100,900	104,252,800	97,966,600	95,557,600	91,695,100	89,238,100
Electronically filed returns	4,204,200	11,806,900	24,580,300	29,329,500	35,402,200	40,206,800
Business returns	16,170,200	18,058,600	19,031,300	19,176,200	19,350,400	19,664,500
Schedule C or C-EZ	14,149,000	16,157,000	17,183,700	17,377,100	17,570,500	17,904,900
Schedule F	2,021,300	1,901,600	1,847,600	1,799,200	1,779,900	1,759,600
Nonbusiness returns	96,134,800	98,001,100	103,515,700	105,710,900	107,746,800	109,780,500
Forms 1040C, 1040NR, 1040PR, and 1040SS	291,000	407,200	502,700	502,500	560,200	649,300
Corporation income [2]	4,319,500	4,817,900	5,241,200	5,398,300	5,469,600	5,561,300
Form 1120	2,334,600	2,197,000	2,207,600	2,202,400	2,161,700	2,128,700
Form 1120A	332,000	319,100	272,500	260,800	245,500	235,800
Form 1120S	1,536,100	2,161,000	2,599,800	2,767,000	2,887,100	3,022,600
Other	116,800	140,800	161,300	168,100	175,300	174,200
Partnership, Forms 1065 and 1065B [3]	1,750,900	1,580,300	1,861,000	1,974,700	2,066,800	2,165,000
Estate and trust income, Forms 1041 and 1041S [4]	2,680,900	3,190,900	3,397,600	3,403,300	3,528,900	3,918,900
Estate tax, Forms 706, 706NA, 706GS(D), and 706GS(T) [5]	60,800	81,400	110,100	116,400	123,600	122,400
Gift tax, Form 709	147,700	216,200	261,200	291,900	308,600	303,800
Tax-exempt organizations [6]	487,400	572,600	618,300	692,600	699,100	724,200
Forms 990 and 990EZ	359,700	406,400	412,000	458,100	461,700	481,000
Form 990-PF	44,700	51,300	61,800	64,900	70,000	73,300
Form 990-T	39,100	49,800	50,200	62,800	52,600	48,200
Forms 990C, 4720, and 5227	43,900	65,100	94,300	106,800	114,900	121,700
Employment [7]	28,911,300	28,654,900	29,106,400	28,973,600	28,841,200	28,935,800
Forms 940, 940EZ, 940PR	5,367,400	5,482,600	5,483,300	5,479,100	5,463,100	5,545,400
Forms 941, 941PR/SS, 944	21,632,100	22,219,100	23,098,500	22,985,100	22,890,300	22,919,800
Forms 943, 943PR	385,400	354,700	330,900	316,200	305,500	291,000
Other	1,526,400	598,500	193,700	193,200	182,300	179,600
Excise [8]	852,000	788,600	821,900	822,300	852,500	815,100
Form 2290	440,700	490,300	562,500	577,800	610,800	588,700
Form 720	339,100	225,300	194,000	183,800	174,700	164,900
Other	72,200	73,000	65,400	60,700	67,100	61,500

Selected Historical and Other Data

Table 21. Selected Returns and Forms Filed or To Be Filed by Type During Specified Calendar Years, 1990-2007—Continued

Type of return or form	Number filed in calendar year—					
	2002	2003	2004	2005	2006	2007
	(7)	(8)	(9)	(10)	(11)	(12)
Individual income [1]	130,977,500	130,836,700	131,297,500	133,023,100	135,197,400	138,471,400
Forms 1040, 1040A, 1040EZ, and 1040PC	130,341,200	130,134,300	130,576,900	132,275,800	134,421,400	137,725,300
Paper returns	83,505,100	77,265,300	69,148,600	63,811,900	61,181,900	57,863,200
Electronically filed returns	46,836,100	52,869,000	61,428,300	68,463,900	73,239,500	79,862,100
Business returns	20,072,000	20,658,500	21,475,200	22,315,700	23,205,700	23,846,600
Schedule C or C-EZ	18,336,500	18,944,500	19,770,600	20,627,100	21,526,700	22,176,700
Schedule F	1,735,500	1,713,900	1,704,700	1,688,600	1,679,000	1,669,900
Nonbusiness returns	110,269,100	109,475,800	109,101,600	109,960,100	111,215,700	113,878,700
Forms 1040C, 1040NR, 1040PR, and 1040SS	636,400	702,400	720,700	747,300	776,000	746,100
Corporation income [2]	5,738,800	5,919,600	6,018,300	6,164,600	6,358,100	6,623,900
Form 1120	2,131,900	2,119,000	2,066,800	2,012,700	2,009,500	2,017,300
Form 1120A	229,700	225,300	214,700	210,900	196,100	186,700
Form 1120S	3,191,100	3,369,100	3,523,900	3,715,200	3,909,700	4,155,800
Other	186,200	206,200	212,800	225,700	242,800	264,200
Partnership, Forms 1065 and 1065B [3]	2,271,800	2,405,400	2,546,400	2,720,300	2,934,600	3,147,000
Estate and trust income, Forms 1041 and 1041S [4]	3,658,000	3,705,000	3,722,400	3,698,600	3,751,400	3,729,800
Estate tax, Forms 706, 706NA, 706GS(D), and 706GS(T) [5]	114,000	87,100	74,200	54,900	60,000	47,300
Gift tax, Form 709	282,600	284,900	262,200	265,500	264,300	255,100
Tax-exempt organizations [6]	744,400	818,200	807,300	819,300	838,800	879,100
Forms 990 and 990EZ	495,000	548,000	533,000	537,400	547,100	566,100
Form 990-PF	76,900	86,000	85,700	87,700	88,800	89,700
Form 990-T	46,400	55,200	57,700	63,400	71,300	93,600
Forms 990C, 4720, and 5227	126,200	129,000	131,000	130,700	131,500	129,800
Employment [7]	29,514,200	30,091,200	30,463,600	31,058,000	30,803,800	30,717,400
Forms 940, 940EZ, 940PR	5,546,300	5,705,600	5,757,200	5,936,800	6,046,000	6,139,800
Forms 941, 941PR/SS, 944	23,510,100	23,942,300	24,278,400	24,705,900	24,351,000	24,192,000
Forms 943, 943PR	283,300	276,600	269,400	262,600	258,000	249,600
Other	174,600	166,700	158,600	152,800	148,800	136,100
Excise [8]	836,400	844,500	834,800	838,900	896,500	895,400
Form 2290	615,200	642,400	660,600	678,700	737,500	743,100
Form 720	161,100	142,100	118,000	107,000	104,700	102,400
Other	60,000	59,900	56,200	53,100	54,300	49,800

[1] Form 1040 is the "long form," and Form 1040A is one of the two "short forms." Starting with Calendar Year 1991, use of Form 1040A was expanded to reflect provisions designed to facilitate usage by elderly taxpayers. Prior to 1994, Form 1040EZ, the other "short form," was for single taxpayers with no dependents; starting in 1994, certain married taxpayers with no dependents could also use this form. The types of income that could be reported on Form 1040EZ were also expanded, starting in 1996, to include unemployment compensation. Form 1040PC, introduced in 1992 and discontinued after 2000, was the equivalent of a "paper" Form 1040, 1040A, or 1040EZ return for which an IRS-approved computer software-generated compressed format was used. Schedule C is for reporting nonfarm sole proprietorship business profits, and Schedule F is for reporting farm sole proprietorship business profits.

The reported data for total Forms 1040, 1040A, 1040EZ, and 1040PC returns, as well as the totals for nonbusiness and business Form 1040 returns with Schedules C or F attached, are comprised of "paper" returns, plus "standard" electronically filed ("e-file") returns. Standard e-file returns are filed by authorized third parties, such as paid preparers and, starting in 1994, approved "online" tax filing companies, as well. For 1992 through 2005, the electronically filed totals also include returns filed by touch-tone telephone ("TeleFile"). IRS discontinued TeleFile after 2005. The last category under individual income tax returns is comprised of Form 1040C (departing alien) for filing years preceding 1992; 1040NR (nonresident alien); 1040PR (self-employment tax, Puerto Rico); and 1040SS (self-employment tax, U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands). Amended returns filed on Form 1040X are excluded.

Selected Historical and Other Data

Table 21. Selected Returns and Forms Filed or To Be Filed by Type During Specified Calendar Years, 1990-2007—Continued

Footnotes—Continued

- [2] Form 1120 is the basic corporation income tax return. Form 1120A is the "short form." Form 1120S is for S corporations (certain qualifying corporations electing to be taxed through shareholders). "Other" includes Forms 1120-F (most foreign companies with U.S. income); Forms 1120-L (domestic and foreign life insurance companies), which are combined with Form 1120 statistics for years before 1995; Forms 1120POL (certain political associations); Forms 1120-H (homeowners' associations); Forms 1120-C (Cooperative Associations); Forms 1120-FSC (Foreign Sales Corporations, or FSCs); Forms 1120-REIT (Real Estate Investment Trusts); Forms 1120-RIC (Regulated Investment Companies); and Forms 1120-PC (Property and Casualty Insurance Companies). "Other" also includes Form 1120DF (for nuclear decommissioning trust funds and related persons). These funds were then included on Form 1120SF (for certain settlement funds), starting in 1994. "Other" excludes Form 1120-DISC for Domestic International Sales Corporations, which were discontinued and mostly replaced by FSCs (see above); and Form 1120 IC-DISC for Interest-Charge Domestic International Sales Corporations (which was used by certain other DISCs after 1985). Amended returns filed on Form 1120X are excluded.
- [3] Includes Form 1065B for certain large partnerships, starting in 1999.
- [4] Form 1041 is the regular income tax return filed for estates and trusts. For 1990, includes former Form 1041S (short form).
- [5] Form 706 is the regular estate tax return; Form 706NA is for U.S. estates of nonresident aliens; Forms 706 GS(D) and 706 GS(T) are for estate tax returns for which the generation-skipping transfer tax applies to distributions and to trust terminations, respectively.
- [6] Form 990 is for tax-exempt organizations, except private foundations (Form 990-PF). Form 990EZ is the short form. Form 990-T is the income tax return filed for businesses conducted by tax-exempt organizations. Form 990-C is for farmers' co-operatives. Form 4720 is for computing the special excise taxes applicable to certain private foundations, and Form 5227 is for split-interest trusts treated as private foundations.
- [7] Form 940 is the annual unemployment (FUTA) tax return filed by employers; Form 940PR is used by employers in Puerto Rico; and Form 940EZ is a shorter version of Form 940. Form 941 is the employer's quarterly return for income tax withheld; Form 941PR is used by employers in Puerto Rico; and Form 941SS by employers in the U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands; Form 944 is the employer's annual return for income tax withheld (starting in Calendar Year 2007). Form 943 is filed to report income tax withheld by employers for agricultural employees. Form 943PR is used by employers in Puerto Rico. "Other" includes Form 945 (annual tax withholding from nonpayroll distributions), included in 1995 and subsequent years; Form 942 (quarterly return for household employees) and Form 942PR (quarterly return for household employees filed by Puerto Rico employers), both discontinued after 1995; and Form CT-1 (annual Railroad Retirement and Unemployment Tax Return).
- [8] Form 720 is the IRS quarterly excise tax return. Form 2290 is the IRS return used to report heavy highway vehicle use tax. "Other" includes Form 730 (tax on wagering) and Form 11C (occupational tax and registration return for wagering). (Excise tax returns exclude those now filed with the Alcohol and Tobacco Tax and Trade Bureau (TTB) and the Customs Service).

NOTES: Detail may not add to totals because of rounding. Tax law and tax form changes affect the year-to-year comparability of the data.

SOURCE: U.S. Department of the Treasury, Internal Revenue Service, Office of Research, Analysis, and Statistics, Office of Research, Projections and Forecasting Group.

Selected Historical and Other Data

Table 22a. Taxpayers Receiving Assistance, Tax Years 2000-2005

[Some estimates based on samples—all data are in thousands]

Type of assistance	Tax year					
	2000	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)
Returns with paid preparer signature [1]:						
All returns	69,115	72,477	72,519	76,818	78,418	80,033
Form 1040EZ [2]	958	2,096	1,953	1,690	1,719	1,580
Form 1040A [2]	4,180	3,854	3,460	3,328	3,023	2,817
Form 1040, total [2]	63,977	66,526	67,106	71,800	73,675	75,636
Form 1040 Business, total	13,855	14,194	14,461	15,897	16,456	16,886
Nonfarm	12,154	12,517	12,805	14,169	14,701	15,138
Farm	1,701	1,677	1,656	1,728	1,754	1,748
Form 1040 Nonbusiness, total	50,121	52,332	52,644	55,903	57,219	58,750
With itemized deductions	19,678	20,889	21,252	21,425	22,539	23,259
Without itemized deductions	30,444	31,443	31,392	34,479	34,680	35,490
Electronically filed [2]	26,223	30,501	33,810	40,910	45,865	50,345

[1] Number of returns with a paid preparer signature is based on the sample used for *Statistics of Income—Individual Income Tax Returns*.

[2] Data on electronically filed returns are included in the counts of Form 1040, 1040A, 1040EZ returns, shown above in Table 22a, for all years. Data are based on the full SOI samples of returns filed throughout the entire year.

Table 22b. IRS Assistance for Individual Taxpayers, Fiscal Years 2002-2007

[All data are in thousands]

Type of assistance	Fiscal year					
	2002	2003	2004	2005	2006	2007
	(1)	(2)	(3)	(4)	(5)	(6)
Assistance provided through the internet (IRS.gov):						
Number of visits	n.a.	n.a.	n.a.	n.a.	193,904	214,964
Number of downloads	n.a.	n.a.	n.a.	n.a.	204,231	164,565
Call or walk-in assistance:						
Toll-free telephone assistance calls [1]	85,593	88,510	77,579	59,099	56,993	56,314
Taxpayer Assistance Center contacts	9,211	8,589	7,320	6,629	6,525	7,037
Paper forms and publications:						
Forms, publications, and orders for paper products	5,667	5,400	5,138	4,989	4,304	3,871
Libraries, banks, postal service distribution sites, grocery stores, copy centers, and office supply outlets stocking paper products [2]	58	51	46	42	26	27
Taxpayer education and tax return preparation:						
Returns prepared through Volunteer Income Tax Assistance and Tax Counseling for the Elderly programs	n.a.	1,607	1,935	2,111	2,268	2,628
Volunteers assisting in taxpayer education and return preparation programs	77	80	75	62	69	77

n.a.—Not available.

[1] Includes both live and automated telephone assistance telephone calls.

[2] Reflects the number of organizations distributing forms and publications. Each organization may have multiple branches.

SOURCE: *Internal Revenue Data Book*.

Selected Historical and Other Data

Table 23. U.S. Individual Income Tax: Personal Exemptions and Lowest and Highest Bracket Tax Rates, and Tax Base for Regular Tax, Tax Years 1913-2007

[Amounts are in dollars]

Tax year	Personal exemptions [1]			Tax rates for regular tax—			
				Lowest bracket		Highest bracket	
	Single persons	Married couples	Dependents	Tax rate [2] (percent)	Taxable income under—[3]	Tax rate [2] (percent)	Taxable income over—[3]
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
1913	3,000	4,000	N/A	1.0	20,000	7.0	500,000
1914	3,000	4,000	N/A	1.0	20,000	7.0	500,000
1915	3,000	4,000	N/A	1.0	20,000	7.0	500,000
1916	3,000	4,000	N/A	2.0	20,000	15.0	2,000,000
1917	1,000	2,000	200	2.0	2,000	67.0	2,000,000
1918	1,000	2,000	200	6.0	4,000	77.0	1,000,000
1919	1,000	2,000	200	4.0	4,000	73.0	1,000,000
1920	1,000	2,000	200	4.0	4,000	73.0	1,000,000
1921	1,000	[4] 2,500	400	4.0	4,000	73.0	1,000,000
1922	1,000	[4] 2,500	400	4.0	4,000	58.0	200,000
1923	1,000	[4] 2,500	400	[5] 3.0	4,000	[5] 43.5	200,000
1924	1,000	2,500	400	[6] 1.5	4,000	46.0	500,000
1925	1,500	3,500	400	[7] 1.125	4,000	25.0	100,000
1926	1,500	3,500	400	[7] 1.125	4,000	25.0	100,000
1927	1,500	3,500	400	[7] 1.125	4,000	25.0	100,000
1928	1,500	3,500	400	[8] 1.125	4,000	25.0	100,000
1929	1,500	3,500	400	[8] 0.375	4,000	24.0	100,000
1930	1,500	3,500	400	[8] 1.125	4,000	25.0	100,000
1931	1,500	3,500	400	[8] 1.125	4,000	25.0	100,000
1932	1,000	2,500	400	4.0	4,000	63.0	1,000,000
1933	1,000	2,500	400	4.0	4,000	63.0	1,000,000
1934	1,000	2,500	400	[9] 4.0	4,000	63.0	1,000,000
1935	1,000	2,500	400	[9] 4.0	4,000	63.0	1,000,000
1936	1,000	2,500	400	[9] 4.0	4,000	79.0	5,000,000
1937	1,000	2,500	400	[9] 4.0	4,000	79.0	5,000,000
1938	1,000	2,500	400	[9] 4.0	4,000	79.0	5,000,000
1939	1,000	2,500	400	[9] 4.0	4,000	79.0	5,000,000
1940	800	2,000	400	[9,10] 4.4	4,000	[10] 81.1	5,000,000
1941	750	1,500	400	[9] 10.0	2,000	81.0	5,000,000
1942	500	1,200	350	[9] 19.0	2,000	88.0	200,000
1943	500	1,200	350	[9] 19.0	2,000	88.0	200,000
1944	[11] 500	[11] 1,000	[11] 500	23.0	2,000	[12] 94.0	200,000
1945	[11] 500	[11] 1,000	[11] 500	23.0	2,000	[12] 94.0	200,000
1946	500	1,000	500	[13] 19.0	2,000	[13] 86.45	200,000
1947	500	1,000	500	[13] 19.0	2,000	[13] 86.45	200,000
1948	[14] 600	[14] 1,200	600	[15] 16.6	4,000	[15] 82.13	400,000
1949	[14] 600	[14] 1,200	600	[15] 16.6	4,000	[15] 82.13	400,000
1950	[14] 600	[14] 1,200	600	[16] 17.4	4,000	[16] 84.36	400,000
1951	[14] 600	[14] 1,200	600	20.4	4,000	[17] 91.0	400,000
1952	[14] 600	[14] 1,200	600	22.2	4,000	[18] 92.0	400,000
1953	[14] 600	[14] 1,200	600	22.2	4,000	[18] 92.0	400,000
1954	[14] 600	[14] 1,200	600	20.0	4,000	[19] 91.0	400,000
1955	[14] 600	[14] 1,200	600	20.0	4,000	[19] 91.0	400,000

Footnotes at end of table.

Selected Historical and Other Data

Table 23. U.S. Individual Income Tax: Personal Exemptions and Lowest and Highest Bracket Tax Rates, and Tax Base for Regular Tax, Tax Years 1913-2007—Continued

[Amounts are in dollars]

Tax year	Personal exemptions [1]			Tax rates for regular tax—			
				Lowest bracket		Highest bracket	
	Single persons	Married couples	Dependents	Tax rate [2] (percent)	Taxable income under—[3]	Tax rate [2] (percent)	Taxable income over—[3]
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
1956	[14] 600	[14] 1,200	600	20.0	4,000	[19] 91.0	400,000
1957	[14] 600	[14] 1,200	600	20.0	4,000	[19] 91.0	400,000
1958	[14] 600	[14] 1,200	600	20.0	4,000	[19] 91.0	400,000
1959	[14] 600	[14] 1,200	600	20.0	4,000	[19] 91.0	400,000
1960	[14] 600	[14] 1,200	600	20.0	4,000	[19] 91.0	400,000
1961	[14] 600	[14] 1,200	600	20.0	4,000	[19] 91.0	400,000
1962	[14] 600	[14] 1,200	600	20.0	4,000	[19] 91.0	400,000
1963	[14] 600	[14] 1,200	600	20.0	4,000	[19] 91.0	400,000
1964	[14] 600	[14] 1,200	600	16.0	1,000	77.0	400,000
1965	[14] 600	[14] 1,200	600	14.0	1,000	70.0	200,000
1966	[14] 600	[14] 1,200	600	14.0	1,000	70.0	200,000
1967	[14] 600	[14] 1,200	600	14.0	1,000	70.0	200,000
1968	[14] 600	[14] 1,200	600	14.0	1,000	[20] 75.25	200,000
1969	[14] 600	[14] 1,200	600	14.0	1,000	[21] 77.0	200,000
1970	[14] 625	[14] 1,250	625	14.0	1,000	[22] 71.75	200,000
1971	[14] 675	[14] 1,350	675	14.0	1,000	[23] 70.0	200,000
1972	[14] 750	[14] 1,500	750	14.0	1,000	[24] 70.0	200,000
1973	[14] 750	[14] 1,500	750	14.0	1,000	[24] 70.0	200,000
1974	[14] 750	[14] 1,500	750	[25] 14.0	1,000	[24, 25] 70.0	200,000
1975	[14,26] 750	[14,26] 1,500	[26] 750	14.0	1,000	[24] 70.0	200,000
1976	[14,27] 750	[14,27] 1,500	[27] 750	14.0	1,000	[24] 70.0	200,000
1977	[14,27] 750	[14,27] 1,500	[27] 750	[28] 14.0	[28] 3,200	[24] 70.0	203,200
1978	[14,27] 750	[14,27] 1,500	[27] 750	[28] 14.0	[28] 3,200	[24] 70.0	203,200
1979	[14] 1,000	[14] 2,000	1,000	[28] 14.0	[28] 3,400	[24] 70.0	215,400
1980	[14] 1,000	[14] 2,000	1,000	[28] 14.0	[28] 3,400	[24] 70.0	215,400
1981	[14] 1,000	[14] 2,000	1,000	[28,29] 14.0	[28] 3,400	[24,29] 69.125	215,400
1982	[14] 1,000	[14] 2,000	1,000	[28] 12.0	[28] 3,400	50.0	85,600
1983	[14] 1,000	[14] 2,000	1,000	[28] 11.0	[28] 3,400	50.0	109,400
1984	[14] 1,000	[14] 2,000	1,000	[28] 11.0	[28] 3,400	50.0	162,400
1985	[14,30] 1,040	[14,30] 2,080	[30] 1,040	[28] 11.0	[28, 31] 3,540	50.0	[31] 169,020
1986	[14,30] 1,080	[14,30] 2,160	[30] 1,080	[28] 11.0	[28,31] 3,670	50.0	[31] 175,250
1987	[30] 1,900	[30] 3,800	[30] 1,900	11.0	[31] 3,000	38.5	[31] 90,000
1988	[30,32,33] 1,950	[30,32,33] 3,900	[30,32,33] 1,950	[34] 15.0	[31,35] 29,750	[34,35] 28.0	[31,35] 29,750
1989	[30,32,33] 2,000	[30,32,33] 4,000	[30,32,33] 2,000	[34,35] 15.0	[31,35] 30,950	[34,35] 28.0	[31,35] 30,950
1990	[30,32,33] 2,050	[30,32,33] 4,100	[30,32,33] 2,050	[34,35] 15.0	[31,35] 32,450	[34,35] 28.0	[31,35] 32,450
1991	[30,32] 2,150	[30,32] 4,300	[30,32] 2,150	15.0	[31] 34,000	31.0	[31] 82,150
1992	[30,32] 2,300	[30,32] 4,600	[30,32] 2,300	15.0	[31] 35,800	31.0	[31] 86,500
1993	[30,32] 2,350	[30,32] 4,700	[30,32] 2,350	15.0	[31] 36,900	39.6	[31] 250,000
1994	[30,32] 2,450	[30,32] 4,900	[30,32] 2,450	15.0	[31] 38,000	39.6	[31] 250,000
1995	[30,32] 2,500	[30,32] 5,000	[30,32] 2,500	15.0	[31] 39,000	39.6	[31] 256,500
1996	[30,32] 2,550	[30,32] 5,100	[30,32] 2,550	15.0	[31] 40,100	39.6	[31] 263,750
1997	[30,32] 2,650	[30,32] 5,300	[30,32] 2,650	15.0	[31] 41,200	39.6	[31] 271,050
1998	[30,32] 2,700	[30,32] 5,400	[30,32] 2,700	15.0	[31] 42,350	39.6	[31] 278,450
1999	[30,32] 2,750	[30,32] 5,500	[30,32] 2,750	15.0	[31] 43,050	39.6	[31] 283,150
2000	[30,32] 2,800	[30,32] 5,600	[30,32] 2,800	[36] 15.0	[31] 43,850	[36] 39.6	[31] 288,350
2001	[30,32] 2,900	[30,32] 5,800	[30,32] 2,900	[37] 10.0	[31,38] 6,000	[37] 39.1	[31,38] 297,350
2002	[30,32] 3,000	[30,32] 6,000	[30,32] 3,000	10.0	[31] 12,000	38.6	[31] 307,050
2003	[30,32] 3,050	[30,32] 6,100	[30,32] 3,050	10.0	[31] 14,000	35.0	[31] 311,950
2004	[30,32] 3,100	[30,32] 6,200	[30,32] 3,100	10.0	[31] 14,300	35.0	[31] 319,100
2005	[30,32] 3,200	[30,32] 6,400	[30,32] 3,200	10.0	[31] 14,600	35.0	[31] 326,450
2006	[30,39] 3,300	[30,39] 6,600	[30,32,39] 3,300	10.0	[31] 15,100	35.0	[31] 336,550
2007	[30,39] 3,400	[30,39] 6,800	[30,32,39] 3,400	10.0	[31] 15,650	35.0	[31] 349,700

N/A—Not applicable.

Table 23. U.S. Individual Income Tax: Personal Exemptions and Lowest and Highest Bracket Tax Rates, and Tax Base for Regular Tax, Tax Years 1913-2007—Continued

Footnotes

- [1] Personal exemption amounts were deducted at different points in the tax computation, depending on the tax year. For some of the earlier years, they were deducted only from the statutory "net income" subject to the basic "normal tax," for other years, only from the "net income" subject to the "surtax," and, for still other years, from the "net income" subject to both normal tax and surtax. (Footnote 2, below, includes a description of "normal tax" and "surtax.") For more recent years, personal exemptions have been deducted in computing "taxable income," the current tax base for "regular" tax purposes.
- [2] Tax rates shown in Table 23 are for the "regular" income tax, i.e., for "normal tax" and "surtax," applicable to U.S. citizens and residents. Therefore, the rates exclude provisions unique to nonresident aliens. Tax rates exclude the effect of tax credits (which reduce the tax liability), except as noted, and several specific add-on or other taxes applicable to all or some tax years. Excluded are the "war excess profits tax" (1917), "victory tax" (1942-1943), Social Security "self-employment tax" (starting with 1951), tax under the "income averaging" provisions (1964-1986) and under the farm income averaging provisions (starting with 1998), and the "recapture taxes" resulting from having to recompute and pay back certain tax credits in later years (starting with 1963), the "maximum tax" on "earned income" or on "personal service income" (1971-1981), the "minimum tax" on "tax preferences" (1970-1983), and the "alternative minimum tax" on "tax preferences" (starting with 1979). Also excluded are such other taxes as the tax on recipients of accumulation distributions of trusts (starting with 1954) and the "special averaging tax" or "multiple recipient special averaging tax" on recipients of lump-sum distributions from qualified retirement plans (starting with 1974). In addition, Table 23 excludes taxes associated with the preferential treatment of capital gains, starting with 1922 (although certain gains received preferential treatment as early as 1918). At various times, these treatments have taken the form of special tax rates; special definitions; different asset holding periods; ceilings on taxes; and exclusions from income. Included among these special treatments were "alternative tax" (1938-1986) and its variations for the earlier years, although all of these taxes were in some way tied to the structure for regular tax. Until 1948, a single set of tax rates applied to all taxpayers, regardless of marital or filing status, and married couples filing joint returns were taxed on the combined income of each spouse. However, a second, lower set of rates was introduced, starting with 1948, for married couples filing jointly. (To simplify the Table 23 presentation for these more recent years, only the lowest and highest tax rates for married persons filing jointly are shown.) Under this change, the combined tax of husband and wife became twice the combined tax that would have applied if their combined "taxable income" ("net income" for years before 1954) were cut in half. Thus, taxpayers using the joint return filing status "split" their incomes for tax purposes, in effect doubling the width of their taxable income (or net income) size "brackets." The lowest and highest tax rate brackets shown in columns 4 and 6 in Table 23 are, therefore, the brackets for married couples filing jointly that result from taking into account this doubling of the bracket widths. Starting with 1952, a third set of rates was introduced (not shown) for "heads of household," i.e., for unmarried individuals who paid over half the cost of maintaining a home for a qualifying person (e.g., a child or parent), or for certain married individuals who had lived apart from their spouses for the last 6 months of the tax year. This filing status was liberalized, starting with 1970, and provides approximately half the advantage of the income-splitting described above. Starting with 1954, the full benefits of income-splitting allowed married couples filing jointly (i.e., the same tax rates and taxable income brackets) were extended to a new, fourth filing status, "surviving spouse" (i.e., individuals widowed for 1 to 2 years following the death of a spouse, provided they had a dependent child and had not remarried). The remaining filing status was for "single persons," who used the rates formerly applicable to taxpayers in general. However, these latter rates were moderated, starting with 1969, by limiting the tax so that it would not exceed 20 percent more than the tax on married couples filing jointly. One result of the 1969 law change was that certain married couples filing jointly had to pay more tax than they would have paid if each spouse had filed separately. To help mitigate this effect, a special deduction in computing adjusted gross income was allowed for 1982-1986 for two-earner couples filing jointly. This deduction was initially 5 percent of the lesser of \$30,000 or the "earned income" of the spouse with the lesser earnings. The percentage was increased to 10 percent, starting with 1983. The deduction provision was repealed, starting with 1987, when new, lower rates and a reduced number of tax brackets began. For tax years preceding 1954, the lowest tax rate, as shown in Table 23, was either the rate for the basic "normal tax" (if there was just one rate for normal tax) or the lowest of the several rates for "normal tax" (if there was more than one rate for normal tax). The highest tax rate was the sum of the uppermost of the graduated rates (if any) for normal tax, plus the uppermost of the additional, graduated "surtax" rates, provided that both rates were applied to the same income. For example, for 1932, there were two graduated rates for normal tax, 4 percent (on the first \$4,000 of income) and 8 percent (on all income over \$4,000), and graduated rates for "surtax" that ranged from 1 percent to 55 percent. In Table 23, the lowest rate for 1932 is, therefore, shown as 4 percent (the lower of the two normal tax rates) and the highest rate as 63 percent (the sum of the 8-percent higher, graduated rate for normal tax on income over \$4,000, plus 55 percent, the highest of the graduated, surtax rates, on income over \$1 million.). As another example, for 1941, there was just one rate for normal tax, 4 percent, but it applied to all income. The lowest of the surtax rates, 6 percent, was applied to all income under \$2,000, so that income under \$2,000 was taxed at both the 4-percent normal tax rate and the 6-percent surtax rate. Therefore, the lowest rate shown in Table 23 for 1941 is 10 percent, the sum of these two tax rates. The highest rate is the sum of the 4-percent normal tax on total statutory "net income," plus the highest graduated surtax rate, 77 percent on income over \$5 million, so that income over \$5 million was taxed at 81 percent, the sum of the two rates. For tax years starting with 1954, normal tax and surtax rates were, in effect, combined into a single rate structure.
- [3] The definition of the income base (and, thus, the tax "bracket" boundaries) to which the tax rates were applied differs over the years, depending on how the following were determined and figured: statutory adjustments to or exclusions from income; personal exemptions; itemized deduction expenditures, which were sometimes described as income "credits"; standard deductions; the various thresholds and ceilings; and statutory "taxable income" (and its predecessor "net income"). Therefore, the lowest and highest taxable income amounts, as shown in Table 23, are not comparable for all years, and the amounts described as for statutory taxable income for tax years preceding 1954 are actually for statutory net income. (Statutory net income was income after subtracting deductions but, for most years, was before subtracting personal exemptions. Statutory taxable income was after subtracting both deductions and personal exemptions. Taxable income is the tax base for recent years. Net income required certain adjustments to arrive at the tax base, depending on whether the income was subject to normal tax, surtax, or both). See also footnote 2, above.
- [4] For 1921-1923, the personal exemption amount for married couples (column 2) decreased to \$2,000 if statutory "net income" exceeded \$5,000.
- [5] For 1923, the tax rates shown (columns 4 and 6) are after a 25-percent statutory credit or refund.
- [6] For 1924, the lowest tax rate (column 4) is after reduction by an "earned income credit," equal to 25 percent of the "normal tax" on the first \$5,000 of total statutory "net income" and the normal tax on the first \$10,000 of "earned net income," but limited to 25 percent of the normal tax on total net income.
- [7] For 1925-1927, the lowest tax rate (column 4) is after reduction by an "earned income credit" equal to 25 percent of the total tax on the first \$5,000 of total statutory "net income" and the total tax on the first \$20,000 of "earned net income," but limited to 25 percent of the total tax on earned net income (not to exceed 25 percent of the sum of "normal tax" on total net income plus the "surtax" on earned net income.)
- [8] For 1928-1931, the lowest tax rate (column 4) is after reduction by an "earned income credit" equal to 25 percent of the total tax on the first \$5,000 of total statutory "net income" and the total tax on the first \$30,000 of "earned net income," but subject to the same limitations described in footnote 7, above. For 1929 only, there was a special reduction in normal tax rates as provided for in a joint resolution of Congress.
- [9] For 1934-1943, the tax rate (column 4) excludes the effect of an "earned income credit," allowed as a deduction equal to 10 percent of the first \$14,000 of "earned net income" (before credit) and the first \$3,000 of total statutory "net income" (before credit), but limited to 10 percent of earned net income (not to exceed 10 percent of total net income).

Selected Historical and Other Data

Table 23. U.S. Individual Income Tax: Personal Exemptions and Lowest and Highest Bracket Tax Rates, and Tax Base for Regular Tax, Tax Years 1913-2007—Continued

Footnotes—Continued

- [10] For 1940, tax rates (columns 4 and 6) include "defense tax," computed as 10 percent of the total "regular" tax, but limited to 10 percent of statutory "net income" in excess of the total regular tax.
- [11] For 1944-1945, the personal exemption amounts (columns 1-3) were for "surtax" purposes only. The exemption for basic "normal tax" purposes was \$500 per tax return, augmented by the "earned income" of the spouse, up to \$500, on joint returns.
- [12] For 1944-1945, the highest tax rate (column 6) was subject to a maximum effective rate limitation equal to 90 percent of statutory "net income."
- [13] For 1946-1947, tax rates (columns 4 and 6) are the effective rates after a statutory 5-percent reduction of combined "tentative normal tax and surtax." The highest rate (column 6) was subject to a maximum effective rate limitation equal to 85.5 percent of statutory "net income."
- [14] For 1948-1986, in addition to the personal exemptions (columns 1-2), there were additional personal exemptions for blind taxpayer(s) and for taxpayers(s) age 65 or over.
- [15] For 1948-1949, tax rates (columns 4 and 6) are the effective rates after statutory reductions ranging from 17.0 percent of the first \$400 of combined "tentative normal tax and surtax" to 9.75 percent of combined tentative normal tax and surtax over \$100,000. The highest tax rate (column 6) was subject to a maximum effective rate limitation equal to 77.0 percent of statutory "net income."
- [16] For 1950, tax rates (columns 4 and 6) are the effective rates after statutory reductions ranging from 13.0 percent of the first \$400 of combined "tentative normal tax and surtax" to 7.3 percent of combined tentative normal tax and surtax over \$100,000. The highest tax rate (column 6) was subject to a maximum effective rate limitation equal to 87.0 percent of statutory "net income."
- [17] For 1951, the highest tax rate (column 6) was subject to a maximum effective rate limitation equal to 87.2 percent of statutory "net income."
- [18] For 1952-1953, the highest tax rate (column 6) was subject to a maximum effective rate limitation equal to 88.0 percent of statutory "net income."
- [19] For 1954-1963, the highest tax rate (column 6) was subject to a maximum effective rate limitation equal to 87.0 percent of statutory "taxable income."
- [20] For 1968, the highest tax rate (column 6) includes a Vietnam War surcharge equal to 7.5 percent of tax (as defined for this purpose). However, this surcharge did not apply to "regular" tax generated at the lowest rate.
- [21] For 1969, the highest tax rate (column 6) includes a Vietnam War surcharge equal to 10 percent of tax (as defined for this purpose). However, this surcharge did not apply to "regular" tax generated at the lowest rate.
- [22] For 1970, the highest tax rate (column 6) includes a Vietnam War surcharge equal to 2.5 percent of tax (as defined for this purpose). However, this surcharge did not apply to "regular" tax generated at the lowest rate.
- [23] For 1971, "earned net income" was subject to a "maximum tax" of 60 percent (not shown in column 6).
- [24] For 1972-1981, "earned net income" (broadened to become "personal service net income" after 1976) was subject to a "maximum tax" of 50 percent (not shown in column 6).
- [25] For 1974, tax rates (columns 4 and 6) do not take into account a statutory rebate of 10 percent of total income tax after credits. In general, the minimum rebate was \$100 and the maximum, \$200, but could not exceed the tax liability.
- [26] For 1975, a \$30-per-capita tax credit was allowed in addition to the personal exemptions shown in columns 1-3.
- [27] For 1976-1978, a tax credit was allowed, in addition to the personal exemptions shown in columns 1-3, that was equal to the larger of \$35 per capita or 2 percent of the first \$9,000 of statutory "taxable income."
- [28] For 1977-1986, in order to help preserve the conceptual comparability of the amounts shown with those for earlier and later years, the lowest tax rates in column 4 and the lowest "taxable income" amounts in column 5 exclude the so-called "zero tax rate" and the "zero bracket amount," which were unique to the tax computation for these 10 years.
- [29] For 1981, tax rates (columns 4 and 6) are after a 1.25-percent statutory tax credit.
- [30] Starting with 1985, the personal exemption amounts (columns 1-3) reflect annual adjustments for inflation, using the U.S. Department of Labor Consumer Price Index for Urban Consumers ("CPS-U").
- [31] Starting with 1985, tax "bracket" boundaries (columns 5 and 7) were indexed for inflation, using the U.S. Department of Labor Consumer Price Index (as described in footnote 30).
- [32] Starting with 1988, the amount eligible to be deducted for personal exemptions (columns 1-3) was phased out for certain high-income taxpayers. For 1988-1990, this was accomplished as part of the tax computation (see footnote 34, below).
- [33] For 1988-1990, excludes the effect on certain high-income taxpayers of the phaseout of the amount deductible for personal exemptions (columns 1-3).
- [34] For 1988-1990, the tax rates (columns 4 and 6) exclude the effects on certain high-income taxpayers of the phaseout both of the benefit of the 15-percent tax rate (compared to the 28-percent rate) and the amount deductible for personal exemptions. This phaseout was accomplished by imposing an additional, 5-percent tax on income above certain levels, based on filing status, thus creating a "temporary" 33-percent tax rate. At the point where the taxpayer had completely phased out the two benefits by use of the 33-percent rate, the tax rate on any remaining taxable income above the phaseout range returned to 28 percent (see also footnote 35). As Table 23 shows, beginning with 1991, this phaseout was replaced by including an additional, 31-percent, graduated rate for taxable incomes above certain levels. Two other, higher, graduated rates were subsequently added, starting with 1993, the higher of which is shown in Table 23.
- [35] For 1988-1990, the 15-percent tax rate (column 4), which applied to the first \$29,750 of statutory "taxable income" (column 5), gradually increased to the top "brackets" rate, 28 percent (column 6), when taxable income (included in column 7) reached between \$71,900 and \$149,250. This was the range at which the 15-percent rate was phased out for certain high-income taxpayers, all of whose incomes were then effectively taxed at the higher 28-percent rate through use of the "temporary" 33-percent rate (see footnote 34, above, for additional information). The boundaries of the phaseout range were adjusted for inflation for 1989-1990, although the top tax rate on the taxable income above that covered by the phaseout range remained 28 percent. Therefore, the top taxable income and top tax bracket rate shown in Table 23 for 1988-1990 do not take into account the higher, 33-percent, "temporary" phaseout rate.

Selected Historical and Other Data

Table 23. U.S. Individual Income Tax: Personal Exemptions and Lowest and Highest Bracket Tax Rates, and Tax Base for Regular Tax, Tax Years 1913-2007—Continued

Footnotes—Continued

[36] For 2000, the tax rates (columns 4 and 6) do not reflect a special statutory refund, partially offset for 2001, of between \$300 and \$600, depending on the size of income tax for 2000 and filing status. See also footnote 37, below.

[37] For 2001, the tax rates (columns 4 and 6) do not reflect a 5-percent tax credit of up to \$300, \$500, or \$1,000, depending on the filing status. This credit effectively reduced the lowest rate on the income shown in column 5 from 15 percent to 10 percent, in lieu of an explicit 10-percent rate. However, the credit was reduced by the amount of the special statutory refund made in 2001 (based on tax for 2000), described in footnote 36, above. The 10-percent rate was only for dependents.

[38] For the change in the lowest tax "bracket" boundary (columns 5 and 7) for 2001, see footnotes 36 and 37, above.

[39] For 2006-2007, the phaseout of the personal exemption was reduced by one-third (to a minimum of \$1,100 per exemption for 2006, \$1,133 for 2007).

SOURCE: Advisory Commission on Intergovernmental Relations, *Significant Features of Fiscal Federalism*, Volume I, Budget Processes and Tax Systems, 1995, September 1996 (based, in part, on *Tax Foundation, Facts and Figures on Government Finance*, 1988-89 edition, 1988); Pechman, Joseph A., *Federal Tax Policy*, fifth edition, The Brookings Institution, 1987 (based on relevant public laws and reports prepared by the Congressional Joint Economic Committee, including *The Federal Revenue System: Facts and Problems*, 1961, and *The Federal Tax System: Facts and Problems*, 1964); *Statistics of Income—Part I* (in particular, the historical synopses of laws included as appendices in the reports for 1949-1953) and *Statistics of Income—Individual Income Tax Returns* (annually, for 1954-1988); and relevant public laws and reports issued by the Congressional Joint Committee on Taxation for subsequent years, as well as reports, such as *Overview of the Federal Tax System for 1990, 1991, and 1994*, Committee on Ways and Means, U.S. House of Representatives, and reports issued by the Congressional Joint Committee on Taxation for subsequent years, including *Overview of Present Law and Economic Analysis Relating to Marginal Tax Rates* and *The President's Individual Income Tax Rate Proposals*, 2001.

Selected Historical and Other Data

Table 24. U.S. Corporation Income Tax: Tax Brackets and Rates, 1909-2005 [1]

Year [2]	Taxable income brackets [3]	Rates (percent)
1909-1913 (February 28)	First \$5,000	0
	Over \$5,000	1.00
1913 (March 1)-1915	All taxable income	1.00
1916	All taxable income	2.00
1917 [4]	All taxable income	6.00
1918 [4]	First \$2,000	0
	Over \$2,000	12.00
1919-1921 [4]	First \$2,000	0
	Over \$2,000	10.00
1922-1924	First \$2,000	0
	Over \$2,000	12.50
1925	First \$2,000	0
	Over \$2,000	13.00
1926-1927	First \$2,000	0
	Over \$2,000	13.50
1928	First \$3,000	0
	Over \$3,000	12.00
1929	First \$3,000	0
	Over \$3,000	11.00
1930-1931	First \$3,000	0
	Over \$3,000	12.00
1932-1935 [5]	All taxable income	13.75
1936-1937 [5,6]	First \$2,000	8.00
	Over \$2,000, not over \$15,000	11.00
	Over \$15,000, not over \$40,000	13.00
	Over \$40,000	15.00
1938-1939 [5]	Taxable income \$25,000 or less:	
	First \$5,000	12.50
	Next \$15,000	14.00
	Next \$5,000	16.00
	Taxable income over \$25,000	19.00
1940 [5,7]	Taxable income \$31,964.30 or less:	
	First \$5,000	[8] 14.85
	Next \$15,000	[8] 16.5
	Next \$5,000	[8] 18.7
	Next \$6,964.30	[8] 38.3
	Taxable income over \$31,964.30, not over \$38,565.84:	
	First \$5,000	[8] 15.4
	Next \$15,000	[8] 16.9
	Next \$5,000	[8] 18.9
	Next \$13,565.84	[8] 36.9
	Taxable income over \$38,565.84	[8] 24
1941 [5,7]	Taxable income \$38,461.54 or less:	
	First \$5,000	[9] 21
	Next \$15,000	[9] 23
	Next \$5,000	[9] 25
	Next \$13,461.54	[9] 44
	Taxable income over \$38,461.54	[9] 31

Footnotes at the end of table.

Selected Historical and Other Data

Table 24. U.S. Corporation Income Tax: Tax Brackets and Rates, 1909-2005 [1]—Continued

Year [2]	Taxable income brackets [3]	Rates (percent)
1942-1945 [5,7]	Taxable income \$50,000 or less: First \$5,000 Next \$15,000 Next \$5,000 Next \$25,000 Taxable income over \$50,000	[9] 25 [9,10] 27 [9,10] 29 [9,10] 53 [9,10] 40
1946-1949	Taxable income \$50,000 or less: First \$5,000 Next \$15,000 Next \$5,000 Next \$25,000 Taxable income over \$50,000	[9] 21 [9] 23 [9] 25 [9,10] 53 [9,10] 38
1950 [11]	First \$25,000 Over \$25,000	23.00 [10] 42
1951 [11]	First \$25,000 Over \$25,000	[12] 28.75 [12] 50.75
1952-1963 [11]	First \$25,000 Over \$25,000	[13] 30 [13] 52
1964	First \$25,000 Over \$25,000	22.00 [13] 50
1965-1967	First \$25,000 Over \$25,000	22.00 [13] 48
1968-1969 [14]	First \$25,000 Over \$25,000	[15] 24.2 [13,15] 52.8
1970 [14]	First \$25,000 Over \$25,000	[16] 22.55 [16,17] 49.2
1971-1974 [14]	First \$25,000 Over \$25,000	22.00 [18] 48
1975-1978 [14]	First \$25,000 \$25,000-\$50,000 Over \$50,000	20.00 22.00 [19] 48
1979-1981 [14]	First \$25,000 \$25,000-\$50,000 \$50,000-\$75,000 \$75,000-\$100,000 Over \$100,000	17.00 20.00 [20] 30 [20] 40 [20] 46
1982 [14]	First \$25,000 \$25,000-\$50,000 \$50,000-\$75,000 \$75,000-\$100,000 Over \$100,000	16.00 19.00 [20] 30 [20] 40 [20] 46
1983 [14, 21]	First \$25,000 \$25,000-\$50,000 \$50,000-\$75,000 \$75,000-\$100,000 Over \$100,000	15.00 18.00 [20] 30 [20] 40 [20] 46
1984-1986 [14]	First \$25,000 \$25,000-\$50,000 \$50,000-\$75,000 \$75,000-\$100,000 \$100,000-\$1,000,000 \$1,000,000-\$1,405,000 Over \$1,405,000	15.00 18.00 [20] 30 [20] 40 [20] 46 [20] 51 [20] 46

Footnotes at the end of table.

Selected Historical and Other Data

Table 24. U.S. Corporation Income Tax: Tax Brackets and Rates, 1909-2005 [1]—Continued

Year [2]	Taxable income brackets [3]	Rates (percent)
1987 [22,23]	First \$25,000	15.00
	\$25,000-\$50,000	16.50
	\$50,000-\$75,000	27.50
	\$75,000-\$100,000	[24] 37
	\$100,000-\$335,000	[24] 42.5
	\$335,000-\$1,000,000	[24] 40
	\$1,000,000-\$1,405,000	[24] 42.5
	Over \$1,405,000	[24] 40
1988-1992	First \$50,000	15.00
	\$50,000-\$75,000	25.00
	\$75,000-\$100,000	34.00
	\$100,000-\$335,000	39.00
	Over \$335,000	34.00
1993-2005	First \$50,000	15.00
	\$50,000-\$75,000	25.00
	\$75,000-\$100,000	34.00
	\$100,000-\$335,000	39.00
	\$335,000-\$10,000,000	34.00
	\$10,000,000-\$15,000,000	35.00
	\$15,000,000-\$18,333,333	38.00
	Over \$18,333,333	35.00

[1] The rates shown are the "standard" or "ordinary" rates, applying to all taxable corporate net income unless otherwise provided. However, there have always been numerous exceptions and special rates based on the type of corporation, the type of income, and other factors. In addition, there have been, at various times, additional taxes related to income that increased the statutory rates. When possible, these are noted in other footnotes to this table for the years for which they were effective. Credits, deductions, and other alterations in the definition of taxable income also effectively alter the tax rate, but these are too numerous and too frequent to include in a table such as this. The most important types of corporations to which these rates have not always applied, or not applied as they did to other corporations, are: *Section 501(c) and similar Nonprofit Corporations*: Corporations not organized or operated for profit are generally exempt from the corporation income tax except, since 1950, on business income unrelated to their exempt purposes. *Mutual and cooperative organizations*: Most of these were treated as nonprofits in the early days of the income tax. Most have long since been made taxable as ordinary corporations, but there are still some exceptions. Credit unions and small mutual property insurance companies are exempt. Rural electrical and telephone cooperatives are exempt on income generated in transactions with their members. Farmers' cooperatives are not taxed on income distributed to their members. *Insurance companies*: Because of the nature of insurance, determining taxable income has often been a problem for the tax system. Insurance companies have been subjected to a number of different tax structures since 1921, including special rates and complete exemption of premium income. They are currently taxed at the same rates as other corporations on income calculated using reserve deductions (which other corporations are not allowed). *Regulated Investment Companies (since 1936) and Real Estate Investment Trusts (since 1961)*: These investment companies are not taxed on profits distributed to shareholders if they distribute substantially all of their incomes annually. *S Corporations*: Since 1958, certain closely held corporations could elect to be taxed through their shareholders, as partnerships are, and not pay the corporate tax at all (except in special, unusual circumstances). *Foreign corporations*: Companies incorporated outside the U.S. are taxed on business income earned in the U.S. at the regular corporate rates, but may be taxed on investment income at special statutory or treaty rates. *U.S. corporations with foreign-source income*: The U.S. taxes the worldwide income of U.S. corporations; however, since 1918, taxes paid to foreign governments on foreign-source income can be credited against the U.S. tax otherwise due on that income. (Before 1918, the foreign taxes were allowed as a deduction against worldwide income.) *U.S. Possessions Corporations*: Since 1921, corporations earning most of their incomes in a U.S. possession were subject to reduced taxes. From 1921 to 1976, they were taxable only on U.S.-source income; since 1976, they have received a credit for manufacturing income earned in a possession (including Puerto Rico). The credit is now being phased out and is scheduled to end after 2005. *Affiliated groups*: Corporations that are closely affiliated through stock ownership have usually been allowed to consolidate their financial statements for tax purposes and file one return for the group, but there have always been restrictions, and, sometimes, they have been charged an additional tax for the privilege. In 1932 and 1933, consolidated returns were subject to an additional tax of .75 percent. In 1934 and 1935, only railroad companies were allowed to file consolidated returns, and the additional tax was 1 percent. From 1936 to 1941, there was no additional tax, but the privilege was restricted to railroads and a few other companies. From 1942 to 1964, most domestic affiliated groups that met the stock ownership and other requirements could file consolidated returns, but the surtax on such a group was increased by 2 percentage points. The additional tax on consolidated returns was repealed, effective December 31, 1963. The most important type of income to have received special rates was "long-term" capital gains. From 1942 through 1987, the tax rate was capped at a maximum rate lower than the highest corporate rate. (The rates are noted in footnotes to the table.) Although there is currently no special rate for corporations' capital gains, long-term capital gains are still treated separately from other income in the Tax Code. During World War I, the Great Depression, World War II, and the Korean War, additional taxes were imposed on what were called "war profits" or "excess profits." These are noted in the table in footnotes to the applicable years. In addition to taxes based on net income, there have been from time to time taxes based on accumulated earnings that were not distributed to shareholders, designed to limit tax avoidance at the individual stockholder level. Taxes on "undue" accumulations have been imposed (though seldom paid) since the inception of the income tax. These were supplemented, since 1934, by a "personal holding company" tax, equal to the highest individual income tax rate, on the undistributed earnings of closely held companies accumulating investment income. There was also a Depression-era tax on accumulated earnings (noted below). In recent years, there have also been "minimum taxes" designed to supplement the regular taxes. These have the effect of a separate set of tax rates. These are noted in footnotes to the table.

[2] Calendar year unless otherwise noted. Taxpayers whose fiscal years spanned years with different rates were required to prorate the year's income between the two rate structures. Before 1933, the proration was based on the number of months in each year; after 1932, it was based on the number of days in each year.

[3] "Taxable income" is used here to mean the amount of income to which the rates shown were applied. The concept has had various names and various meanings over the years covered; so, brackets for one year are not necessarily comparable with those for another.

Selected Historical and Other Data

Table 24. U.S. Corporation Income Tax: Tax Brackets and Rates, 1909-2005 [1]—Continued

Footnotes—Continued

- [4] An additional tax on "excess profits" and/or "war profits" was in effect from 1917 to 1922. It was allowed as a deduction in computing income tax.
- [5] An additional "declared value" excess profits tax, based on profits in excess of a percentage of the value of corporate stock, was in effect from 1933 through 1945. It was a deduction for income tax purposes.
- [6] An additional surtax ranging from 7 percent to 27 percent was imposed on undistributed profits.
- [7] From June 1940 to the end of 1945, a tax on profits in excess of average prewar earnings was also imposed. It was taken into account, as either a deduction or a credit, for the income tax and the other excess profits tax.
- [8] The rates for 1940 include extra "defense tax" rates that are integrated with the regular rates in later years.
- [9] These rates are the sum of the "normal tax" rates and the "surtax" rates, which actually applied to slightly different definitions of taxable income.
- [10] Beginning with Tax Year 1942, gains on the sale of assets held for more than 6 months (long-term capital gains) could be treated separately from other taxable income and taxed at a maximum rate of 25 percent.
- [11] An excess profits tax was also in effect from July 1950 through Calendar Year 1953. The tax was 30 percent of an adjusted profits figure reduced by credits for the level of prewar profits. It was not offset against income tax, but the sum of income and excess profits taxes was capped at a given percentage of income (from 62 percent to 70 percent).
- [12] These rates reflect a tax increase (for the Korean War), effective March 31, 1951. The maximum capital gain tax rate was also increased to 26 percent.
- [13] From April 1, 1954, through Calendar Year 1969, the maximum tax rate on capital gains was 25 percent.
- [14] From 1969 through 1986, corporations were also subject to an "add-on minimum tax" on certain "tax preference" items (such as percentage depletion, accelerated depreciation, etc.) above a certain amount. For Tax Years 1969 through 1976, the tax was 10 percent of tax preferences in excess of \$30,000; after 1976, the tax was 15 percent of preferences in excess of the greater of \$10,000 or regular income tax.
- [15] Rates include the Vietnam War surcharge of 10 percent.
- [16] Includes a 2.5-percent Vietnam War surcharge.
- [17] The maximum tax rate on long-term capital gains was increased to 28 percent.
- [18] The maximum tax rate on long-term capital gains was increased to 30 percent.
- [19] The holding period for long-term capital gain treatment of assets was increased from 6 months to 9 months in 1977 and 12 months in 1978. The rate remained at 30 percent.
- [20] The maximum tax rate on long-term capital gains was 28 percent.
- [21] Beginning in 1983, incorporated professional practices ("personal service corporations") have been taxed on all taxable income at the corporate tax rate applicable to the highest income bracket.
- [22] The Tax Reform Act of 1986 (TRA86) established a new rate structure effective for Tax Year 1988 and made the rates for Transition Year 1987 an average of the pre-TRA rates for 1986 and the post-TRA rates for 1988.
- [23] A new "alternative minimum tax" (AMT) replaced the add-on minimum tax, effective in 1987. It required a calculation of an alternative measure of taxable income that reduced or eliminated many tax preference items. The tax was 20 percent of the excess of this "alternative minimum taxable income" (AMTI) over \$40,000. The \$40,000 exemption was reduced by 25 percent of the excess of AMTI over \$150,000. AMT in excess of regular tax could be carried over as a credit against regular tax in future years. In 1998, "small" corporations (generally, those with average gross receipts of less than \$5 million) were exempted from the AMT.
- [24] The maximum tax rate on capital gains was capped at 34 percent for 1987, which was to be the rate on the highest corporate tax bracket in 1988 and after, according to TRA86. The maximum capital gain rate was raised to 35 percent when the highest corporate rate bracket was increased in 1993.
- SOURCE: Blakey, Roy G. and Gladys C. Blakey (1940), *The Federal Income Tax*, New York. Gravelle, Jane G. (1994), *The Economic Effects of Taxing Capital Income*, Appendix A, History of Capital Income Taxation in the United States, MIT. Internal Revenue Service, *Form 1120 series and Instructions*, various years. Internal Revenue Service, *Statistics of Income for 1949, Part 2*, Appendix A. U.S. Congress, Joint Committee on Taxation, Explanations of various tax acts, published after each major tax act since the 1960s. U.S. Senate, Committee on the Budget, Tax Expenditures: Compendium of Background Materials on Individual Provisions, published periodically.

SOI Sampling Methodology and Data Limitations

This appendix discusses typical sampling procedures used in most Statistics of Income (SOI) programs. Aspects covered briefly include sampling criteria, selection techniques, methods of estimation, and sampling variability. Some of the nonsampling error limitations of the data are also described, as well as the tabular conventions employed.

Additional information on sample design and data limitations for specific SOI studies can be found in the separate SOI reports (see pages 319-320 at the end of this *Bulletin*). More technical information is available, on request, by writing to the Director, Statistics of Income Division RAS:S, Internal Revenue Service, P.O. Box 2608, Washington, DC 20013-2608.

Sample Criteria and Selection of Returns

Statistics compiled for the SOI studies are generally based on stratified probability samples of income tax returns or other forms filed with the Internal Revenue Service (IRS). The statistics do not reflect any changes made by the taxpayer through an amended return or by the IRS as a result of an audit. As returns are filed and processed for tax purposes, they are assigned to sampling classes (strata) based on such criteria as: industry, presence or absence of a tax form or schedule, and various income factors or other measures of economic size (such as total assets, total receipts, size of gift, and size of estate). The samples are selected from each stratum over the appropriate filing periods. Thus, sample selection can continue for a given study for several calendar years—3 for corporations because of the incidence of fiscal (noncalendar) year reporting and extensions of filing time. Because sampling must take place before the population size is known precisely, the rates of sample selection within each stratum are fixed. This means, in practice, that both the population and the sample size can differ from those planned. However, these factors do not compromise the validity of the estimates.

The probability of a return's selection depends on its sample class or stratum and may range from a fraction of 1 percent to 100 percent. Considerations in determining the selection probability for each stratum include the number of returns in the stratum, the diversity of returns in the stratum, and interest in the stratum as a separate subject of study. All this is subject to constraints based on the estimated pro-

cessing costs or the target size of the total sample for the program.

For most SOI studies, returns are designated by computer from the IRS Master Files based on the taxpayer identification number (TIN), which is either the Social Security number (SSN) or the Employer Identification Number (EIN). A fixed and essentially random number is associated with each possible TIN. If that random number falls into a range of numbers specified for a return's sample stratum, then it is selected and processed for the study. Otherwise, it is counted (for estimation purposes), but not selected. In some cases, the TIN is used directly by matching specified digits of it against a predetermined list for the sample stratum. A match is required for designation.

Under either method of selection, the TINs designated from one year's sample are, for the most part, selected for the next year's, so that a very high proportion of the returns selected in the current year's sample are from taxpayers whose previous years' returns were included in earlier samples. This longitudinal character of the sample design improves the estimates of change from one year to the next.

Method of Estimation

As noted above, the probability with which a return is selected for inclusion in a sample depends on the sampling rate prescribed for the stratum in which it is classified. "Weights" are computed by dividing the count of returns filed for a given stratum by the number of population sample returns for that same stratum. These weights are usually adjusted for unavailable returns, outliers, or trimming weights. Weights are used to adjust for the various sampling rates used, relative to the population—the lower the rate, the larger the weight. For some studies, it is possible to improve the estimates by subdividing the original sampling classes into "post-strata," based on additional criteria or refinements of those used in the original stratification. Weights are then computed for these poststrata using additional population counts. The data on each sample return in a stratum are then multiplied by that weight. To produce

Sample returns are designated by computer from the IRS Master Files based on the taxpayer identification number.

SOI Sampling Methodology and Data Limitations

In transcribing and tabulating data from tax returns, checks are imposed to improve the quality of the statistics.

the tabulated estimates, the weighted data are summed to produce the published statistical totals.

Sampling Variability

The particular sample used in a study is only one of a large number of possible random samples that could have been selected using the same sample

design. Estimates derived from the different samples usually vary. The standard error of the estimate is a measure of the variation among the estimates from all possible samples and is used to measure the precision with which an estimate from a particular sample approximates the average result of the possible samples. The sample estimate and an estimate of its standard error permit the construction of interval estimates with prescribed confidence that this interval includes the actual population value.

In SOI reports, the standard error is not directly presented. Instead, the ratio of the standard error to the estimate itself is presented in percentage form. This ratio is called the coefficient of variation (CV). The user of SOI data may multiply an estimate by its CV to recreate the standard error and to construct confidence intervals.

For example, if a sample estimate of 150,000 returns is known to have a coefficient of variation of 2 percent, then the following arithmetic procedure would be followed to construct a 68-percent confidence interval estimate:

$$\begin{array}{ll} 150,000 & \text{(sample estimate)} \\ \times 0.02 & \text{(coefficient of variation)} \\ = 3,000 & \text{(standard error of estimate)} \end{array}$$

then:

$$\begin{array}{ll} 150,000 & \text{(sample estimate)} \\ + \text{ or } - 3,000 & \text{(standard error)} \\ = \{147,000, 153,000\} & \text{(68-percent confidence interval).} \end{array}$$

Based on these data, the interval estimate is from 147 to 153 thousand returns. This means that the average estimate of the number of returns lies within an interval computed in this way. Such an estimate would be correct for approximately two-thirds of all possible

samples similarly selected. To obtain this interval estimate with 95-percent confidence, the standard error should be multiplied by 2 before adding to and subtracting from the sample estimate. (In this particular case, the resulting interval would be from 144 to 156 thousand returns.)

Further details concerning sample design, sample selection, estimation method, and sampling variability for a particular SOI study may be obtained, on request, by writing to the Director, Statistics of Income Division, at the address given above.

Nonsampling Error Controls and Limitations

Although the previous discussion focuses on sampling methods and the limitations of the data caused by sampling error, there are other sources of error that may be significant in evaluating the usefulness of SOI data. These include taxpayer reporting errors and inconsistencies, processing errors, and the effects of any early cutoff of sampling. Additional information on nonsampling error as it applies to individual and corporation income tax returns is presented in the separate SOI reports on these returns.

In transcribing and tabulating the information from returns or forms selected for the sample, steps are taken to improve the quality of the resultant estimates. Tax return data may be disaggregated or recombined during the statistical abstracting and "editing" process that takes place in IRS submission processing centers. This is done to improve data consistency from return to return and to achieve definitions of the data items more in keeping with the needs of major users. In some cases, not all of the data are available from the tax return as originally filed. Sometimes, the missing data can be obtained by the Statistics of Income Division in Washington, DC, through field followup. More often, though, they are obtained through manual or computerized imputation. For this purpose, other information in the return or in accompanying schedules may be sufficient to serve as the basis for making an estimate. Prior-year data for the same taxpayer can be used for this same purpose, or comparable data from business reference books may be substituted.

Data abstracted or "edited" from returns for statistical use are subjected to a number of validation checks, including systematic verifications of a sampling of the work of each tax examiner involved in the SOI process. Data reported on sampled returns

SOI Sampling Methodology and Data Limitations

and previously transcribed as part of processing for the IRS Master Files are subject to validation as part of the administrative process before SOI processing begins. However, during the administrative process, it is only practical to transcribe corrections to errors that have a direct bearing on the tax reported or the refund claimed. Therefore, during the SOI process, checks must also be made to correct any errors or inconsistencies left in the administrative data before the data can be accepted for the statistics.

The Statistics of Income program includes many more tax return items than are transcribed and perfected for IRS tax administration needs, especially for items reported in tax return schedules in support of the various summary totals reported on the return. Therefore, checks must also be designed to validate these additional data items and to assure that they are consistent with other data entries.

Most of the data validation checks made during the SOI process take the form of computerized tests of each record. In addition to verifying that internal consistency and proper balance and relationships among the tax return items and statistical classifications are maintained, this process is intended to check on consistency with tax law provisions, acceptable reporting practices, and generally accepted accounting principles. Most testing occurs during the data abstracting and editing operation, while the tax return source document is still on hand, although some testing for certain programs occurs later on. Records failing the tests are subjected to further review and correction.

Finally, before publication, the statistics are reviewed for accuracy and reasonableness in light of the tax law provisions, taxpayer reporting variations and other limitations, tolerances and statistical techniques allowed or employed in data processing and estimating, economic conditions, and comparability with other statistical series. However, these controls do not completely eliminate the possibility of error. When discovered, errors in *Bulletin* tables are corrected, usually through published errata.

Table Conventions

Published estimates subject to excessive sampling variability are identified for most of the statistics by means of an asterisk (*) presented alongside the estimate or in place of an estimate. Presence of an asterisk means that the sampling rate was less than 100 percent of the population and that there were fewer than 10 sample observations available for estimation purposes. This method produces a rough indication of excessive sampling variability. However, the results will differ somewhat from more precise indicators of excessive sampling variability based on the standard statistical formula. For some of the statistics based on samples, asterisking was not possible because of resource and other constraints. Users should keep this limitation in mind when using these data.

A zero, in place of a frequency or an amount, in any given table cell presenting data based on an SOI sample, indicates either that (1) there were no returns in the population with the particular characteristic, or (2) because of its rarity, instances of the characteristic were not present among the sampled returns. However, for statistics based on returns selected for the sample at the 100-percent rate, a zero indicates a presumption of no returns with the particular characteristic in the population.

In addition to sampling variability, Statistics of Income is required to prevent disclosure of information about specific taxpayers or businesses in its tables. Therefore, a weighted frequency (and the associated amount, where applicable) of less than 3 is either combined with data in an adjacent cell(s) so as to meet the criteria, or deleted altogether. Similar steps are taken to prevent indirect disclosure through subtraction. However, any combined or deleted data are included in the appropriate totals. (A double asterisk is used in a cell where a frequency or amount has been deleted.) Most data on tax-exempt, non-profit organizations are excluded from disclosure review because the Internal Revenue Code and regulations permit public access to most of the information reported by these organizations.

Public Release of SOI Information

Goals for Public Release of SOI Information

Statistics of Income program and year	End of tax year	Close of filing period—		Close of sampling period	Tentative release date for final data
		Regular	With extensions of time		
	(1)	(2)	(3)	(4)	(5)
Individual income tax returns:					
2006	December 2006	April 2007	October 2007	December 2007	August 2008
2007	December 2007	April 2008	October 2008	December 2008	August 2009
Nonfarm sole proprietorships:					
2006	December 2006	April 2007	October 2007	December 2007	August 2008
2007	December 2007	April 2008	October 2008	December 2008	August 2009
Partnerships:					
2006	December 2006	April 2007	October 2007	December 2007	July 2008
2007	December 2007	April 2008	October 2008	December 2008	July 2009
Corporations: [1]					
2005	June 2006	September 2006	March 2007	June 2007	March 2008
2006	June 2007	September 2007	March 2008	June 2008	March 2009
Corporation foreign tax credit: [2]					
2005	June 2006	September 2006	March 2007	June 2007	October 2008
2006	June 2007	September 2007	March 2008	June 2008	October 2009
Controlled foreign corporations: [2]					
2006	June 2007	September 2007	March 2008	June 2008	October 2009
Tax-exempt organizations: [3]					
2005	November 2006	April 2007	October 2007	December 2007	August 2008
2006	November 2007	April 2008	October 2008	December 2008	August 2009
Private foundations: [3]					
2005	November 2006	April 2007	October 2007	December 2007	August 2008
2006	November 2007	April 2008	October 2008	December 2008	August 2009
Tax-exempt organization unrelated business income: [3]					
2005	November 2006	April 2007	October 2007	December 2007	October 2008
2006	November 2007	April 2008	October 2008	December 2008	October 2009
Estate tax returns:					
2007	[4]	[4]	[4]	December 2007	October 2008
2008	[4]	[4]	[4]	December 2008	October 2009
Split-interest trusts:					
2007	[5]	[5]	[5]	December 2007	October 2008
2008	[5]	[5]	[5]	December 2008	October 2009
Gift tax returns:					
2007	[4]	[4]	[4]	December 2007	October 2008
2008	[4]	[4]	[4]	December 2008	October 2009
Nonresident alien estate tax returns:					
2007	[4]	[4]	[4]	December 2007	February 2009
2008	[4]	[4]	[4]	December 2008	May 2009
Fiduciary extracts:					
2007	[5]	[5]	[5]	December 2007	October 2008
2008	[5]	[5]	[5]	December 2008	October 2009
Tax-exempt bonds:					
2006	[6]	[6]	[6]	December 2007	April 2008
2007	[6]	[6]	[6]	December 2008	April 2009

[1] Corporation statistics for 2005 represent accounting periods ended July 2005 through June 2006. Study Year 2006 is similarly defined.

[2] Data for 2005 represent accounting periods ending July 2005 through June 2006. Data for Study Year 2006 are similarly defined.

[3] Data for 2005 represent tax years ending between December 2005 and November 2006. Study Year 2006 is similarly defined.

[4] Estate and gift tax data are processed on a filing-year, rather than on a year-of-death or gift-year (tax-year) basis. At a later stage (not shown here), filing years are combined by year of death or gift year, respectively.

[5] Split-interest trust and fiduciary income tax statistics are processed on a filing-year rather than a tax-year basis.

[6] Tax-exempt private activity governmental bond statistics are collected annually based on issue year. Arbitrage rebate and penalty studies are conducted biennially, for tax years ending in odd numbers.

SOI Projects and Contacts

General Statistical Information: (202) 874-0410 Fax: (202) 874-0964 e-mail: sis@irs.gov

Projects*	Primary Analysts	Frequency and Program Content
Americans Living Abroad: 2006 Program	Scott Hollenbeck Maureen Keenan Kahr	This periodic study is conducted every 5 years. It covers foreign income, foreign taxes paid, and foreign tax credit shown on individual income tax returns. Data are classified by size of adjusted gross income and country.
Controlled Foreign Corporations: 2004 Program 2006 Program	Randy Miller Jason Wenrich	This semiannual study provides data on activities of foreign corporations that are controlled by U.S. corporations. Data are classified by industry group and country.
Controlled Foreign Partnerships: 2004 Program 2006 Program	Bill States	This study provides data on activities of foreign partnerships that are controlled by U.S. corporations or partnerships. Frequency of this study has not been determined.
Corporation Foreign Tax Credit: 2004 Program 2005 Program 2006 Program	Scott Luttrell Rob Singmaster Scott Luttrell	This annual study provides data on foreign income, taxes paid, and foreign tax credit reported on corporation foreign income tax returns. Data are classified by industry group and country.
Corporation Income Tax Returns: 2005 Program 2006 Program	Bill Rush Todd Reum Ellen Legel	Basic data are produced annually and cover complete income statement, balance sheet, tax, tax credits, and details from supporting schedules. Data are classified chiefly by industry group or asset size.
Entity Classification Election:	John Comisky Lawrence Sao	This annual study provides data from all Entity Classification Elections, including the type of election and whether the entity is foreign or domestic.
Estate Tax: 2004-2006 Program 2007-2009 Program	Brian Raub	This annual study provides information on a gross estate and its composition, deductions, and tax; and information on the age, sex, and marital status of decedents. Basic estate tax return data by year in which returns are filed are produced each year. Also included are data on nonresident aliens who had more than \$60,000 of assets in the United States. Other statistics are available on a year-of-death basis (approximately every 3 years). The most recent study is based on decedents who died in 2004 with returns filed in 2004-2006. The most recent data available are for returns filed in 2005.

SOI Projects and Contacts

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Excise Taxes:

Melissa Laine

Basic data are collected and processed by three Department of the Treasury agencies: the Internal Revenue Service, the Alcohol and Tobacco Tax and Trade Bureau (formerly the Bureau of Alcohol, Tobacco, Firearms, and Explosives), and the Customs Service. Data by type of tax are shown by Fiscal Year (FY) for 1998-2004 and quarterly for FY 2005 and the first two quarters of FY 2006.

Farm Sole Proprietorships:

2003 Program
2004 Program

Kevin Pierce
Mary Jezek

This periodic study provides farm income and expenses classified by industry and gross farm income reported by individuals on Schedule F, *Profit or Loss from Farming*.

Foreign-Controlled Domestic Corporations:

2005 Program

James Hobbs

This annual study covers domestic corporations with 50-percent-or-more stock ownership by a single foreign "person." It covers balance sheet, income statement, and tax-related data, which are classified by industry group, country, and size and age of the corporations. Data are compared to those for other domestic corporations.

Foreign Recipients of U.S. Income:

2006 Program

Scott Luttrell

This annual study provides data by country on income paid to nonresident aliens and the amount of tax withheld for the U.S. Government.

Foreign Trusts:

2006 Program

Dan Holik

This periodic study, conducted every 4 years, provides data on foreign trusts that have U.S. "persons" as grantors, transferors, or beneficiaries. Data include country where the trust was created, value of transfer to the trust, and year the trust was created. The most recent study is for Tax Year 2002.

Gift Tax:

2006 Program
2007 Program
2008 Program

Darien Jacobson

This annual study provides data for type and amount of gift, information on donee, and tax computation items. Information about the donor and gift splitting are also available. Most recent data are for Gift Year 2005.

Individual Income Tax Return Public-Use File:

Mario Fernandez
Mike Weber

Microdata on CD-ROMs are produced annually and contain detailed information obtained from the individual income tax return statistics program, with identifiable taxpayer information omitted to make the file available for public dissemination on a reimbursable basis.

Individual Income Tax Returns:

2004 Program
2005 Program
2006 Program

Maureen Keenan Kahr
Mike Strudler

Basic data are produced annually and cover income, deductions, tax, and credits reported on individual income tax returns and associated schedules. Data are classified by size of adjusted gross income, marital status, or type of tax computation.

SOI Projects and Contacts

General Statistical Information: (202) 874-0410 Fax: (202) 874-0964 e-mail: sis@irs.gov

Individual Income Tax Returns

Special Tabulations:

Mike Parisi

Special tabulations of selected individual income, deduction, and tax data are produced on a reimbursable basis.

Interest-Charge Domestic International Sales Corporations (IC-DISCs):

2005 Program

2006 Program

Dan Holik

These corporations replaced the Domestic International Sales Corporations, or DISCs, as of 1985. Balance sheet, income statement, and export-related data are tabulated every 4 years. The most recent study is for Tax Year 2004.

International Boycott Reports:

2005 Program

2006 Program

Lissa Redmiles

This study provides data on business operations of U.S. "persons" in boycotting countries, as well as the requests and agreements to participate in, or cooperate with, inter-

Migration Flow and County Income Data:

Emily Gross

Migration flow data (based on year-to-year changes in individual income tax return addresses) and county or State income data are available annually on a reimbursable basis. The most recent data are for 2004-2005.

Noncash Charitable Contributions:

Janette Wilson

This study of Individual income tax returns provides detailed asset donations, descriptions of the donees, donor cost, fair market value, and deduction claimed on Form 8283, *Noncash Charitable Contributions*.

Occupation Studies:

Terry Nuriddin

This periodic study classifies individual income tax returns by occupation and contains a dictionary of occupational titles that can be used to enhance the economic data of other individual income tax return studies.

Partnership Returns of Income:

Tim Wheeler
Nina Shumofsky

Basic data, produced annually, cover income statement, balance sheet, and details from supporting schedules. Data are classified chiefly by industry group.

Partnership Withholding Study:

2005 Program

Scott Luttrell

This annual study provides data on U.S. partnership payments to foreign partners. Data are classified by country and recipient type.

Personal Wealth Study:

2005 Program

2006 Program

Barry Johnson
Brian Raub

This periodic study provides estimates of personal wealth of top wealth holders that are generated from estate tax return data using the "estate multiplier" technique, in conjunction with both filing-year and year-of-death estate databases. The most recent data, 2001, are based on returns filed from 2001 to 2003.

SOI Projects and Contacts

General Statistical Information: (202) 874-0410 Fax: (202) 874-0964 e-mail: sis@irs.gov

S Corporations:	Heather Parisi	Annual study data are collected for the income statement and balance sheet, and from supporting schedules. Data are classified by industry group or asset size.
Sales of Capital Assets:	Janette Wilson	This periodic study provides detailed data on the sales of capital assets reported in the capital gains schedule of the individual income tax return, and on sales of residences and personal or depreciable business property.
Sole Proprietorships: 2004 Program 2005 Program 2006 Program	Jeff Curry	Basic data, produced annually, cover business receipts, deductions, and net income reported on Schedule C, <i>Profit or Loss From Business</i> , for nonfarm proprietors, classified by industry group.
Split-Interest Trust Information: 2006 Program 2007 Program 2008 Program	Lisa Schreiber	This annual study provides information on charitable remainder trusts, charitable lead trusts, and pooled income funds. Data include balance sheet, income, deductions, and detail from accumulation and distribution schedules. The most recent data are for Filing Year 2005.
Tax-Exempt Bond Issues: 2005 Program 2006 Program 2007 Program	Cynthia Belmonte	This annual study provides information on private activity and Governmental bond issues by type of property financed, size of face amount, and State. The most recent data are for Tax Year 2005 public purpose bonds and private activity bonds.
Tax-Exempt Organizations (Except Private Foundations): 2004 Program 2005 Program 2006 Program	Paul Arnsberger Paul Arnsberger	This annual study provides balance sheet and income statement data for organizations classified as tax-exempt under subsections 501(c)(3)-(9) of the Internal Revenue Code. The most recent data are for Reporting Year 2004 returns filed in Calendar Years 2005-2006.
Tax-Exempt Organizations, (Private Foundations): 2004 Program 2005 Program 2006 Program	Melissa Ludlum Mark Stanton	This annual study provides balance sheet and income statement data for domestic private foundations and charitable trusts filing a Form 990-PF. The most recent data are for Reporting Year 2003 returns filed in Calendar Years 2005-2006.
Tax-Exempt Organizations, Unrelated Business Income: 2004 Program 2005 Program 2006 Program	Peggy Riley Peggy Riley Melissa Ludlum	This annual study provides tabulations of "unrelated business" income and deductions for organizations classified as tax-exempt under the Internal Revenue Code. The most recent data are for Reporting Year 2003 returns filed in Calendar Years 2005-2006.

SOI Projects and Contacts

General Statistical Information: (202) 874-0410 Fax: (202) 874-0964 e-mail: sis@irs.gov

Taxpayer Usage Study:	Kevin Pierce	This annual program provides weekly frequencies of specific line entries made by taxpayers, the use of various return schedules and associated forms, and general characteristics of the individual taxpayer population, for returns received during the primary filing season (January through April).
Transactions of Foreign-Controlled Corporations:	Mark Lowe	This biennial study provides data on transactions between U.S. corporations and their foreign owners. Data are classified by country and industry group.
U.S. Possessions Corporations:	Dan Holik	This periodic study, planned for every 2 years, provides data on income statements, balance sheets, tax, and "possessions tax credit" for qualifying U. S. possessions corporations. (Most of these corporations are located in Puerto Rico.)
ZIP Code Area Data:	Mike Weber	Statistics on CD-ROM show number of individual income tax returns, exemptions, and several income items by State and 5-digit ZIP Code. Data are available for 2002 and 2004 on a reimbursable basis. (Data for Tax Years 1991, 1998, and 2001 are also available, free of charge, on the IRS Web site: http://www.irs.gov/taxstats/article/0,,id=96947,00.html .)

* Many of the data release dates, i.e., the months in which the Statistics of Income Division expects to release data to users, ahead of publication, on request, are published in each issue of the *SOI Bulletin* (see "Public Release of SOI Information"). For more information about data availability for a particular project, call or fax the numbers shown at the top of the page.

SOI Products and Services

Statistics of Income (SOI) data are available in electronic formats and in printed publications. For further information on any of the following products and services, or for answers to questions on the availability of SOI data, other statistical services, or release dates for data, contact SOI's **Statistical Information Services (SIS)**:

Statistical Information Services (sis@irs.gov)
Statistics of Income Division
Internal Revenue Service
P.O. Box 2608 • Washington, DC 20013-2608
(202) 874-0410 • **Fax:** (202) 874-0964

As its name implies, SIS is best able to answer questions about data. It does not supply tax forms or information about the status of an individual's tax refund or audit examination. Media requests should be directed to the IRS Media Relations Branch, Communications Division, on (202) 622-4000.

Electronic Products and Services

Products Available Free on the Internet

SOI's Internet site offers a combination of files presenting SOI tables, articles about SOI data, and information about SOI products and services, as well as non-SOI products, including annual *IRS Data Book* tables, Compliance Research projections, and nonprofit Master File microdata records. At present, over 6,181 files reside there.

Web site: www.irs.gov/taxstats

There is also a direct link to our Web site from FedStats, the gateway to official statistics from the Federal Government: www.fedstats.gov.

Tax Stats

On the Tax Stats Home Page, you will find the following list of topics that will lead you to a wide range of tables, articles, and data that describe and measure elements of the U.S. tax system. There is also a link to check out What's New.

Business Tax Statistics

Corporations • International • Partnerships
Nonfarm Sole Proprietorships
S Corporations • All Topics

Charitable and Exempt Organization Statistics

Charities • Exempt Organization Master File
Private Foundations • Trusts
Tax-Exempt Bonds • All Topics

Individual Tax Statistics

Filing Season Statistics • Estate and Gift Tax
Individual Income Tax • International
Personal Wealth • All Topics

Products, Publications, and Papers

SOI Bulletins • *IRS Data Books*
Conference Papers
All Topics

IRS Operations, Budget, and Compliance

Issuing Refunds • Collecting Revenue
Enforcing Laws • Assisting Taxpayers
All Topics

Statistics by Form

706 • 709 • 990 • 990-PF • 990-T
1040 • 1041 • 1065 • 1118 • 1120
5471 • 5472 • 8038 • All Forms

Statistics of Income (SOI)

About SOI • Careers With SOI
SOI Services • SOI Studies
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Questions On Tax Statistics?

Products Available From SOI

Many of SOI's data files are available for sale on CD-ROM, diskette, tape, or via e-mail through the Statistical Information Services Office. **Prepayment is required for orders of \$100 or more**, with checks made payable to the **IRS Accounting Section**. Contact SIS for information on specific products, prices, sources, media, and ordering instructions.

The following files are currently available on a reimbursable basis and include data from returns covering corporations, individuals, exempt organizations, and private foundations and charitable trusts. Most of these files are tabulations of aggregated data, but some are files of microdata records.

Corporation Income Tax Returns

Corporation Source Book

A magnetic tape or CD-ROM containing data from the *Corporation Source Book* are available for years 1996-2003 at a cost of \$250 per year. Data from the 2004 and 2005 *Corporation Source Books* are available at no charge from the Tax Stats Web site. Data tables from the 2000 through 2005 *Source Book* are also available at no charge from the Tax Stats Web site at: www.irs.gov/taxstats/bustaxstats/article/0,,id=149687,00.html. See also *Printed Publications* section below.

Individual Income Tax Returns

Individual Public-Use Microdata Files

These files include individual income tax returns for 1960, 1962, 1964, and 1966-2004. All of the files have been edited to protect the confidentiality of individual taxpayers. Public-use files of individual income tax returns for 1960, 1962, 1964, and 1966-1991 are available for sale by writing to the Center for Electronic Records at the National Archives and Records Administration, 8601 Adelphi Road, College Park, MD 20740-6001, or by calling toll-free (866) 272-6272. Files for 1992 through 2004 are available on CD-ROM from the SOI Division. Price for the SOI microdata files is \$4,000 per year.

County-to-County Migration Data

One table, based on the year-to-year changes in the addresses shown on the population of returns from the IRS Individual Master File system. This table presents data on migration patterns by county for the entire United States, including inflows and outflows. The data include the number of returns (which approximates the number of households); the number of personal exemptions (which approximates the population); total "adjusted gross income" and "median adjusted gross income" (starting with Filing Year 1996); total money income and median total money income (for Filing Years 1993 through 1996). Available for Filing Years 1984-2006. Price is \$200 per year for the entire United States or \$10 per State per year. (All years for the entire United States are also available for \$500.)

State-to-State Migration Data

One table, based on the year-to-year changes in the addresses shown on the population of returns from the IRS Individual Master File system. This table presents data on migration patterns by State for the entire United States, including inflows and outflows. The data include the number of returns (which approximates the number of house-

holds); the number of personal exemptions (which approximates the population); total "adjusted gross income" and "median adjusted gross income" (starting with Filing Year 1996); total money income and median total money income (for Filing Years 1993 through 1996). Available for Filing Years 1989-2006. Price is \$50 per year for the entire United States or \$10 per State per year.

County Income Data

One table, based on the population of returns from the IRS Individual Master File system. This table presents data for adjusted gross income (total and for selected sources), number of returns (which approximates the number of households), and number of personal exemptions (which approximates the population). The data are presented by county (including State totals) and are available for Tax Years 1989-2005 for the entire United States. Price is \$50 per year for the entire United States or \$10 per State per year.

ZIP Code Area Data

Statistics are available for Tax Years 2002, 2004, and 2005 on CD-ROM showing the number of individual income tax returns; the total number of exemptions and number of dependent exemptions (which approximates population); adjusted gross income; salaries and wages; taxable interest; total tax; contributions; number of returns with Schedules C and F; and number of returns with Schedule A, by State and 5-digit ZIP Code. In addition to these items, data for Tax Year 2004 and 2005 also show the amount of taxable dividends; net capital gain/loss; IRA payment adjustment; self-employed pension adjustment; taxes paid deduction; alternative minimum tax; income tax before credits; earned income credit; and number of returns prepared by paid preparers. Price is \$500 for the entire United States; \$25 for a single State. (Data for Tax Years 1998 and 2001 are available free on SOI's Internet site.) Go to www.irs.gov, select the **Tax Stats** option; Individual Tax Statistics; Individual Income Tax; Zip Code Data (SOI) under Data by Geographic Areas.

Tax-Exempt Organizations

Compendium of Studies of Tax-Exempt Organizations, 1989-1998

This is a compilation of articles on SOI studies of charitable and other nonprofit organizations described in Internal Revenue Code sections 501(c)(3)-(c)(9), private foundations, charitable remainder trusts, and nonprofit organizations' unrelated business income. All of these articles were published previously in various issues of the

SOI Products and Services

Statistics of Income Bulletin. In addition, the *Compendium* includes papers on statistical sampling of tax-exempt organization returns, and other topics relating to tax-exempt organizations and philanthropy that were authored by IRS staff and others who use SOI study data for research. Available at no charge on CD-ROM.

Microdata Records for Tax Year 2004

Microdata records of all Forms 990 and 990-EZ sampled for the annual SOI study of tax-exempt organizations. The samples include 14,947 Internal Revenue Code section 501(c)(3) organizations and 6,577 section 501(c)(4)-(9) organizations. All returns for organizations with assets of \$50,000,000 or more are included in the sample. Microdata records contain information on balance sheets and income statements, as well as weights (to estimate the population), for each organization. Available for download from SOI's Tax Stats Web site at www.irs.gov/taxstats/charitablestats/article/0,,id=97176,00.html, or may be purchased on CD-ROM for \$20.

Microdata Records for Tax Years 1992-2003

Microdata records of all Forms 990 and 990-EZ sampled for the annual SOI study of tax-exempt organizations. Microdata records contain information on balance sheets and income statements, as well as weights (to estimate the population), for each organization. Available for download from SOI's Tax Stats Web site at www.irs.gov/taxstats/charitablestats/article/0,,id=97176,00.html, or may be purchased on CD-ROM for \$20.

Private Foundations (and Charitable Trusts)

Microdata Records for Tax Year 2004

Microdata records of all Forms 990-PF sampled for the annual SOI study covering private foundations and Internal Revenue Code section 4947 (a)(1) charitable trusts. The file contains both operating and nonoperating foundations and trusts. The sample includes 11,226 returns. (All returns filed by foundations with assets of \$10 million or more, as well as the population of returns filed by nonexempt charitable trusts, are included in the sample.) Microdata records contain information on revenue, expenses, assets, and distributions, as well as weights, for each foundation or trust. Available for download from SOI's Tax Stats Web site at www.irs.gov/taxstats/charitablestats/article/0,,id=96996,00.html, or may be purchased for \$20.

Microdata Records for Tax Years 1992-2003

Microdata records of all Forms 990-PF sampled for the annual SOI study covering private foundations and Inter-

nal Revenue Code section 4947 (a)(1) charitable trusts. Microdata records contain information on revenue, expenses, assets, and distributions, as well as weights, for each foundation or trust. Available for download from SOI's Tax Stats Web site at www.irs.gov/taxstats/charitablestats/article/0,,id=96996,00.html, or may be purchased for \$20.

Printed Publications

Publications Available for Sale From GPO

Recent SOI publications are available from the Superintendent of Documents, U.S. Government Printing Office, Washington, DC, **by calling (202) 512-1800, or faxing (202) 512-2250.** (Credit cards are accepted.) Publications may also be obtained by using the order form at the end of this *Bulletin* or write to:

Superintendent of Documents

P.O. Box 371954
Pittsburgh, PA 15250-7954

If you determine from the Government Printing Office that any of the next four items is out of print, telephone **Statistical Information Services on (202) 874-0410** for assistance.

IRS Data Book, 2007

Annually, Publication 55B, Stock No. 048-004-02498-5
Price: \$11 Foreign: \$15.40

This volume pertains to Fiscal Year 2007—October 1, 2006, through September 30, 2007. The report provides information on returns filed and taxes collected, enforcement, taxpayer assistance, the IRS budget and workforce, and other selected activities.

Statistics of Income Bulletin

Quarterly, Publication 1136, Stock No. 748-005-00000-5
Subscription price: \$53; Single copy price: \$39

This series provides the earliest published financial statistics from individual and corporation income tax returns. The *Bulletin* also includes annual data on nonfarm sole proprietorships and partnerships, as well as periodic or special studies of particular interest to tax analysts, administrators, and economists. Historical tables include data from SOI, as well as tax collections and refunds by type of tax.

Statistics of Income—2004, Corporation Income Tax Returns

Publication 16, Stock No. 048-004-02495-1

Price: \$50 Foreign: \$70

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Presents information on:

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- taxable income
- income tax
- tax credits
- assets
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Classifies data by:

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Statistics of Income—2005, Individual Income Tax Returns

Publication 1304, Stock No. 048-004-02497-7

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Presents information on:

- sources of income
- exemptions
- itemized deductions
- tax computations

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- size of adjusted gross income
- marital status
- type of tax computation

Publications Available From SOI

Other SOI periodicals and one-time reports are available for sale from Statistical Information Services. These reports include data from returns covering corporations and estate taxes.

Statistics of Income—2005, Corporation Source Book

Publication 1053, Price: \$175, plus \$10 for shipping and handling

This document presents detailed income statement, balance sheet, tax, and selected items, by sector, major and minor industrial groups, and size of total assets for all

returns and separately for returns with net income. Separate statistics on S corporations are included by sector. Industry detail is based on the North American Industry Classification System (NAICS). The report, which underlies the *Statistics of Income—Corporation Income Tax Returns* publication, is part of an annual series and can be purchased in its entirety or by page. *Corporation Source Book* industry pages and notes for 1963 through the present are available at a cost of \$30, plus \$1 per page copying charge (free for orders under 5 pages). The complete, printed version of the *Source Book* for selected prior years, 1984-2004, is also for sale at \$175 per year, plus \$10 for shipping and handling. See also *Electronic Products and Services* section.

Compendium of Federal Estate Tax and Personal Wealth Studies

Publication 1773, Price: \$26, plus \$10 for shipping and handling

Part I of this report focuses on data from estate tax returns, describing decedents, their beneficiaries, and the composition of their estates. It contains a methodological discussion of the strategy used in weighting sample data for the estate studies and presents statistics on selected components of decedents' estates, 1916-1990. Information on charitable giving is also included.

Part II presents a series of articles describing the estate-multiplier technique and its applications for personal wealth estimates, estimates of personal wealth for selected years 1962-1989, and a discussion of the relationship among realized income, wealth, and well-being.

Special Studies in Federal Tax Statistics, 2006

Publication 1299, No charge

This is the sixth edition of the IRS Methodology Report series *Special Studies in Federal Tax Statistics, 2006*. The papers included in this volume were presented in 2006 at the Joint Statistical Meetings of the American Statistical Association (ASA) held in Seattle, Washington, the National Tax Association's Annual Conference on Taxation held in Boston, Massachusetts, and the United Nations Statistical Commission and Economic Commission for Europe Conference of European Statisticians held in Geneva, Switzerland.

This year's compilation has been divided into six major sections:

SOI Products and Services

■ Innovative uses of longitudinal panels, information documents, and time-series analysis to study the impact of the U.S. tax system; ■ Measuring, monitoring, and evaluating Internal Revenue Service data;	■ Broad quality issues in organizations; ■ Survey-based estimation; ■ Tax benefits and administrative burdens, recent research from the IRS; and ■ Statistical dissemination and communication.

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SOI BULLETIN

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Volume 28 , Number 1

The *Statistics of Income (SOI) Bulletin* is issued quarterly, in February, May, August, and November, by the Statistics of Income Division of the Internal Revenue Service. The report provides the earliest published annual financial statistics obtained from the various types of tax and information returns filed, as well as information from periodic or special analytical studies of particular interest to students of the U.S. tax system, tax policymakers, and tax administrators. Selected historical and other data tables, previously published in every issue of the *SOI Bulletin*, now are published only in the spring issue of the *Bulletin*. These tables are also available on SOI's pages of the IRS Web site (www.irs.gov/taxstats).

Information on the availability of supplemental data on the topics included in this issue, special tabulations undertaken on a reimbursable basis, or other SOI subjects, may be obtained by telephoning the SOI's Statistical Information Services (202-874-0410), or by writing to the Director, Statistics of Income Division RAS:S, Internal Revenue Service, P.O. Box 2608, Washington, D.C. 20013-2608.

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Inside this Issue

Foreign-Controlled Domestic Corporations, 2005

by James R. Hobbs

There were 61,820 domestic corporations each controlled by a foreign person for Tax Year 2005. These foreign-controlled domestic corporations (FCDCs) were relatively few in number, accounting for just 1.1 percent of all U.S. corporations. However, these corporations generated \$3.5 trillion of total receipts with \$9.2 trillion of total assets, accounting for 13.7 percent of the receipts and 13.9 percent of the assets reported on all U.S. corporation income tax returns. Two industrial sectors, manufacturing and wholesale trade, generated more than two-thirds of the total FCDC receipts. Domestic corporations controlled by persons in the United Kingdom reported 20.5 percent of the FCDC total receipts. Profits (net income less deficit) reported by FCDCs for tax purposes were \$165.2 billion for 2005, a substantial increase from the prior year. The U.S. tax liability (total income tax after credits) of FCDCs was \$42.4 billion for 2005, also much larger than that of the prior year.

Controlled Foreign Corporations, 2004

by Lee Mahony and Randy Miller

For Tax Year 2004, foreign corporations controlled by U.S. multinational corporations held \$9.2 trillion in assets and reported \$3.8 trillion in receipts. More than three-fourths of the 74,676 controlled foreign corporations (CFCs) were concentrated in the services (31.4 percent), goods production (25.9 percent), and distribution and transportation of goods (21.7 percent) industrial sectors. More than 45 percent of these CFCs were incorporated in Europe, accounting for 62.2 percent of end-of-year assets, 54.3 percent of total receipts, and 49.8 percent of earnings and profits (less deficit) before income taxes.

Corporate Foreign Tax Credit, 2004

by Scott Luttrell

For 2004, corporations that filed a U.S. tax return claimed foreign tax credits worth \$56.6 billion, representing an all-time high and a 13.2-percent increase over the previous high amount in 2003. The 5,502 corporations that claimed 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. About \$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 income on Form 1118, *Computation of Foreign Tax Credit—Corporations*. 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 for which the primary business was manufacturing claimed 65.6 percent of the total foreign tax credit, while earning 44.6 percent of worldwide taxable income and paying 44.5 percent of U.S. income tax before credits for Tax Year 2004. 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.

Partnership and Sole Proprietorship Data, by Region and State, for Tax Years 2002-2005

by Brian J. Maisano

Between 2002 and 2005, the total number of partnership returns for the United States increased 23 percent, from 2,336,313 to 2,873,194, as tabulated from tax and information returns by the Bureau of Economic Analysis (BEA). During this period, the Southeast region experienced the fastest growth, 36.1 percent. Florida was the fastest growing State in this region, with an increase of 34,623 in the number of partnership returns, or 79.2 percent over the period. Georgia, North Carolina, and Virginia also contributed significantly to the growth of the region. In 2005, the Southeast also held the greatest share of the total number of partnership returns in the nation, 12.1 percent. The Great Lakes region experienced the slowest growth from 2002 to 2005, 21.9 percent.

The total number of sole proprietorship returns for the United States, grew by 392,396 between 2002 and 2005, a 1.9-percent increase over the period. The Great Lakes was the fastest growing region during the period, increasing by 9.0 percent to 3,135,856 returns in 2005, due to strong growth in Michigan, Wisconsin, and Illinois. Among all States, Georgia had both the largest percentage increase and the largest increase in the number of returns during the period from 583,810 returns in 2002 to 678,878 returns in 2005, for a 16.3-percent increase. This growth, however, was not reflected in the rest of the Southeast, which only grew 1.0 percent during the period. Florida contributed largely to this slow growth, with a 14.5-percent decline during the period. California, the largest State in terms of number of returns, declined 11.4 percent during this period, while the next two largest States—Texas and New York—grew by 3.5 percent and 5.5 percent, respectively.

Wealth Transfers, 2005 Gifts

by Darien Jacobson and Melissa Laine

A total of 261,104 Federal gift tax returns was filed for gifts given in 2005, predominantly by wealthy Americans. A total of \$38.5 billion in assets was transferred from donors to donees, or gift recipients. Only 2.9 percent of returns were taxable, with \$1.7 billion in gift tax liability reported. Females represented 47.3 percent of the donee population, while males represented 46.3 percent. The remaining 6.4 percent represented trusts and donees with unknown identities. Gifts of cash were the preferred choice for both female and male donors, with cash assets comprising 49.0 percent of total gifts. Following cash, real estate was the second most frequently gifted asset, accounting for 20.8 percent of asset transfers. In 2005, donors used a variety of mechanisms to transfer their assets. Direct gifts comprised the bulk of transfers, as 76.3 percent of gifts were given outright.

The Credit for Increasing Research Activities: Statistics from Tax Years 2004-2005

by Eurry Kim

The Economic Recovery Tax Act of 1981 first introduced the credit for increasing research activi-

ties. Key modifications to the calculation of the credit were made in the next decade. The Omnibus Budget Reconciliation Act of 1989 instituted gross receipts as a factor in calculating the credit starting in Tax Year 1990. Six years later, the Small Business Job Protection Act of 1996 added the Alternative Incremental Credit calculation method to the existing Regular Credit calculation method. The Regular Credit method has a base-sensitivity component that integrates ratios of historical research spending to average gross receipts into the current calculation. The Alternative Incremental Credit, on the other hand, uses average gross receipts in its calculation.

Persisting through Tax Year 2005, the credit experienced a 14.6-percent increase in claimants over the prior year, with U.S. C corporations claiming \$6.4 billion in credits for increasing research activities. A majority of the \$6.4 billion claimed were attributable to the manufacturing industry. Companies earning more than \$250 million in business receipts claimed the most credits in Tax Years 2001 through 2005.

In the Next Issue

The following articles or data releases are tentatively planned for inclusion in the fall 2008 issue of the *Statistics of Income Bulletin*, scheduled to be published in November 2008:

- Individual Income Tax Returns, 2006;
- Sole Proprietorships, 2006;
- Partnership Returns, 2006;
- Tax-Exempt Governmental and Private Activity Bonds, 2006;
- Charities and Other Tax-Exempt Organizations, 2005;
- Personal Wealth, 2004; and
- Transactions Between Large, Foreign-Owned Domestic Corporations and Related Foreign Persons, 2004.

Foreign-Controlled Domestic Corporations, 2005

by James R. Hobbs

For Tax Year 2005, the 61,820 domestic corporations each controlled by a foreign “person” generated \$3.5 trillion of total receipts with \$9.2 trillion of total assets, reported on income tax returns filed with the Internal Revenue Service (IRS). Both total receipts and total assets increased substantially for 2005, by 14.7 percent and 15.7 percent, respectively, over the previous year.¹ These corporations were small in number, just 1.1 percent of the U.S. total. However, they accounted for 13.7 percent of the receipts and 13.9 percent of the assets reported on all U.S. corporation income tax returns.

The profits (i.e., “net income (less deficit)” shown in the statistics of this article) reported by foreign-controlled domestic corporations (FCDCs) for tax purposes under the Internal Revenue Code were \$165.2 billion for 2005. This was a substantial increase from the \$90.8 billion reported for the prior year. Placed in context, the profits reported on all corporation income tax returns also increased, to \$1.9 trillion for 2005 from \$1.1 trillion for 2004.² FCDCs accounted for 8.5 percent of the profits reported by all corporations for 2005, up from 8.2 percent for 2004.

Of all the FCDCs, 30,870 reported positive profits (i.e., net income) for 2005, totaling \$201.6 billion. This was a 46.1-percent increase over the prior-year amount. The profitable companies for 2005 also reported \$153.0 billion of taxable income (i.e., “income subject to tax”), another significant increase of 46.1 percent over the prior year. The U.S. tax liability (i.e., “total income tax after credits”) of FCDCs was \$42.4 billion for 2005, 41.7 percent more than that of the prior year.

For 2005, there were 3,790 “large” foreign-controlled domestic corporations, each with at least \$250 million of assets or at least \$50 million of receipts. These large FCDCs accounted for most of the key financial items of all FCDCs: 95.1 percent of total assets, 94.6 percent of total receipts, 93.7 percent of

taxable income, and 92.7 percent of total income tax after credits. After an overview of all FCDCs, this article focuses on the large foreign-controlled domestic corporations and compares them to other large domestic corporations, i.e., those not controlled by foreign persons.

Tables showing selected balance sheet, income statement, and tax items for FCDCs are included at the end of this article. Table 1 shows historical FCDC data for selected tax years between 1971 and 2005. Tables 2, 3, and 4 concentrate on Tax Year 2005 data. Table 2 includes information for all FCDCs, classified by major industry under the North American Industry Classification System (NAICS). Table 3 also presents data for all FCDCs, classified by country of the foreign owner, as well as age of the corporation. Table 4 presents information on the “large” FCDCs, classified by industrial sector. For comparison purposes, this table also contains data for the large domestic corporations not controlled by foreign persons.

Foreign Investment in the United States

Foreign investment in the United States can take several forms, including corporations. With regard to corporations, a foreign investor may own stock of a domestic (i.e., United States) company or operate in the United States through a branch of a foreign corporation.³ This article focuses on domestic corporations that are “controlled” by foreign persons. For the foreign-controlled domestic corporations covered in this article, control is defined as ownership by one foreign “person,” directly or indirectly, of 50 percent or more of the U.S. corporation’s voting stock, or of 50 percent or more of the value of all of the corporation’s stock, at any time during the accounting period. A person is an entity, including an individual, corporation, partnership, estate, or trust. (This is discussed in greater depth in the Data Sources and Limitations section. Also, see “constructive ownership rules” and “foreign person” in the Explanation of Selected Terms section.)

James R. Hobbs is a management official with the Special Studies Branch.

¹ For additional 2005 statistics covering foreign-controlled domestic corporations (FCDCs), see Tables 24 and 25 of *Statistics of Income—2005, Corporation Income Tax Returns*, IRS Publication 16. Statistics for tax years prior to 2005 are available in earlier editions of Publication 16. Additionally, for 2004 statistics covering FCDCs, see Hobbs, James R., “Foreign-Controlled Domestic Corporations, 2004,” *Statistics of Income Bulletin*, Summer 2007, Volume 27, Number 1. In addition, FCDC data are included on the IRS Internet site at www.irs.gov, under Tax Stats.

² Total corporate data referenced throughout this article come from: (1) *Statistics of Income Bulletin*, Publication 1136, Spring 2008, Volume 27, Number 4; (2) *Statistics of Income—Corporation Income Tax Returns*, Publication 16, selected years; (3) *Source Book of Statistics of Income—Corporation Income Tax Returns*, Publication 1053, selected years; and (4) unpublished Statistics of Income tabulations.

³ Sections 7701(a)(4) and (5) of the Internal Revenue Code define a domestic corporation as one created or organized in the United States or under the laws of the United States or any State. A foreign corporation is “one which is not domestic.”

Foreign-Controlled Domestic Corporations, 2005

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As specified in the above paragraph, this study excludes returns of domestic corporations with stock owned by a single foreign person of 49 percent or less. However, the tax return forms filed by domestic corporations do indicate the presence of 25-percent to 49-percent foreign owners, and the Statistics of Income program does separately compile data on these domestic corporations. The data are generally not published, but this article includes some summary information for this group of corporations.⁴

Returns of certain domestic companies that are effectively controlled by foreign persons, i.e., those public companies in which “control” may be exercised with as little as 10 percent to 20 percent of the stock holdings, are excluded from both the 50-percent-or-more and the 25-percent to 49-percent tabulations. Tax return forms filed by domestic corporations do not include information about foreign persons with less than 25-percent stock holdings.

The foreign-controlled domestic corporation statistics shown in this article, as well as the unpublished tabulations for domestic corporations with 25-percent to 49-percent foreign owners, exclude domestic corporations with only foreign “portfolio” investment. A foreign portfolio investor, having only a minimal interest in a domestic company, exerts no control over the management of the domestic corporation, except to the extent, for example, of rights to vote periodically in stockholder meetings of the corporation. A foreign portfolio investor is primarily seeking dividend payments, an increase in the value of the shares of stock, or both. The Statistics of Income program does not conduct studies covering foreign portfolio investors of domestic corporations.

In addition to the foreign-controlled domestic corporations study discussed in this article, the Statistics of Income program conducts a separate study covering branches of foreign corporations operating in the United States. Statistics from that study are available to the public.⁵

Foreign-controlled domestic corporations can file tax returns on: (1) Form 1120, *U.S. Corporation Income Tax Return*; (2) Form 1120-L, *U.S. Life Insurance Company Income Tax Return*; (3) Form 1120-PC, *U.S. Property and Casualty Insurance Company Income Tax Return*; (4) Form 1120-REIT, *U.S. Income Tax Return for Real Estate Investment Trusts*; and (5) Form 1120-RIC, *U.S. Income Tax Return for Regulated Investment Companies*. The FCDC statistics shown in this article include all of these return types (unless otherwise stated). Data for all corporation income tax returns discussed in this article include (unless otherwise stated) the five form types listed above, plus two types filed by domestic corporations: Form 1120-A, *U.S. Corporation Short-Form Income Tax Return*, and Form 1120S, *U.S. Income Tax Return for an S Corporation*. Also included in the corporate total is Form 1120-F, *U.S. Income Tax Return of a Foreign Corporation*, for foreign corporations with income effectively connected with a U.S. trade or business. All of these form types are included in the Statistics of Income Corporate Study, from which FCDC statistics are derived.⁶ However, FCDCs cannot file Forms 1120-A, 1120-F, or 1120S.

Foreign-Controlled Domestic Corporations

Growth of Corporations

The estimated numbers of returns filed by FCDCs have remained rather constant during the 10-year period of 1996-2005. There were 62,141 returns of foreign-controlled domestic corporations for 1996; 61,820 for 2005. With the rapid increase in the total numbers of U.S. corporation income tax returns, FCDCs generally comprised a slowly decreasing percentage of those returns, from 1.3 percent for 1996 down to 1.1 percent for 2005. The increase in total filings of U.S. corporation income tax returns has largely been due to the long-term growth in the num-

⁴ For 2005, there were only 4,950 returns that indicated a level of foreign ownership between 25 percent and 49 percent. These companies reported \$194.3 billion of assets, \$113.2 billion of receipts, \$10.2 billion of taxable income, and \$3.6 billion of total income tax after credits. All of these amounts were small in comparison to data for the corporations with at least 50-percent foreign ownership.

⁵ For the most recent statistics, there are tabulations covering branch operations of foreign corporations with income “effectively connected” with a U.S. trade or business in *Statistics of Income—2005, Corporation Income Tax Returns*, IRS Publication 16. See Tables 10 and 11 of this publication. Statistics for tax years prior to 2005 are available in earlier editions of Publication 16 and on the IRS Internet site at www.irs.gov, under Tax Stats.

⁶ As a result of the Statistics of Income (SOI) sampling process, data shown in this article for “all corporations” exclude certain out-of-scope returns, such as returns for homeowners’ associations (Form 1120-H) and certain political organizations (Form 1120-POL). For a more complete listing of the returns excluded from the SOI corporation sample, see the Description of the Sample and Limitations of the Data section of *Statistics of Income—2005, Corporation Income Tax Returns*. On the other hand, in addition to legally defined corporations, the Internal Revenue Code recognizes many types of businesses as corporations, including joint stock companies and unincorporated associations (e.g., certain partnerships, savings and loan associations, and mutual savings banks). These organizations possess characteristics typical of the corporate form, such as continuity of life, limited liability of owners, and transferability of shares of capital ownership. They filed Forms 1120 and were included in the SOI corporation sample.

Foreign-Controlled Domestic Corporations, 2005

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ber of Forms 1120S filed by S corporations. FCDCs are not eligible to elect to be treated as S corporations for Federal income tax purposes.

To the extent that FCDCs filed consolidated income tax returns, the data included in this article actually represent more corporations than the stated number of returns. FCDCs, like most other corporations, could elect to file consolidated returns for affiliated groups of domestic corporations. Consolidated returns contained the combined financial data of two or more corporations in which a common parent corporation owned at least 80 percent of the stock of at least one member of the group, and at least 80 percent of the stock of each other member of the group was owned within the group. A consolidated return filed by a common parent was treated as a unit, with each statistical item being determined on the basis of the combined data of the affiliated group. For 2005, there were 5,736 consolidated returns filed by FCDCs, 9.3 percent of all FCDC returns. These returns accounted for \$8.1 trillion of assets (87.6 percent of the total for all FCDCs), \$3.0 trillion of receipts (86.7 percent of the total), \$148.7 billion of net income less deficits (90.0 percent of the total), \$135.2 billion of taxable income (88.4 percent of the total), and \$37.1 billion of total income tax after credits (87.4 percent of the total).

In contrast to the numbers of returns, the growth of foreign investment in the United States through foreign-controlled domestic corporations during the last 10 years was evident in most of the financial items.⁷ In particular, the percentages of both assets and receipts accounted for by FCDCs increased over the 1996-2005 time period.

The assets of domestic corporations controlled by foreign persons increased by 15.7 percent between 2004 and 2005, as compared to the 10.5-percent increase for the assets reported on all U.S. corporation income tax returns.⁸ As a result of these changes, the percentage of total corporate assets accounted for by FCDCs rose from 13.3 percent for 2004 to 13.9 percent for 2005. Additionally, there was a substantial

rise in FCDC assets during the previous 10 years. The value of FCDC assets increased faster than did the value of assets of other corporations. Thus, the 13.9-percent share of the 2005 total corporate assets is a substantial increase from the 10.6-percent share for 1996 (Figure A).

Total receipts of FCDCs increased by 14.7 percent between 2004 and 2005, as compared to the increase of 12.3 percent for all corporations. Looking at a 10-year time period, the \$3.5 trillion of FCDC receipts for 2005 is a 111.6-percent increase over the \$1.7 trillion for 1996, using "current dollars" (which reflect actual values that prevailed during the specified years, i.e., no adjustments to the values were made to remove the effects of inflationary price changes). In comparison, total receipts reported on all U.S. corporation income tax returns grew from \$15.5 trillion for 1996 to \$25.5 trillion for 2005, a 64.3-percent increase. As a result of the relatively rapid growth rate by FCDCs, their share of the receipts reported on all corporate returns increased from 10.7 percent for 1996 to 13.7 percent for 2005.

The growth of FCDCs can also be measured from the early 1970s, when a question concerning foreign ownership of corporations was first placed on the income tax return. For 1971, the 5,154 FCDCs reported \$36.7 billion of total assets and \$39.2 billion of total receipts. They accounted for just 0.3 percent of the returns, 1.3 percent of the assets, and 2.1 percent of the receipts reported by all corporations for that year (Table 1).

Industry Characteristics

For 2005, foreign-controlled domestic corporations were involved in each of the 19 industrial sectors (treating wholesale trade and retail trade as separate sectors) listed in Figure B. However, 39,930 of the 61,820, nearly two-thirds of the total, had primary business activities in one of the following four industrial sectors: (1) wholesale trade (15,789 returns); (2) real estate and rental and leasing (11,571 returns); (3) manufacturing (7,128 returns); and (4) professional,

⁷ For additional information on foreign investment in the United States, see *Survey of Current Business* reports, produced by the U.S. Department of Commerce, Bureau of Economic Analysis (BEA). BEA periodically produces several articles related to this subject. In addition to the printed versions of these articles, electronic versions can be obtained from the Internet at www.bea.gov/international/index.htm. The data in these reports may not be directly comparable to the information shown in this article because of definitional differences, such as those relating to time periods covered, levels of foreign ownership, and levels of company consolidation.

⁸ The percentage changes in the assets between 2004 and 2005 of domestic corporations controlled by foreign persons, as well as those of all corporations, may overstate the actual "change in investment." Assets are generally reported at book value on tax returns (i.e., the value at the time of acquisition). The book value of newly acquired assets is generally greater than the book value of similar assets they replaced. New corporations may tend to have a greater percentage of new assets with greater book values. To the extent that new corporations may have comprised a different portion of FCDCs than they did for other companies, the comparability of the two percentages may be limited.

Foreign-Controlled Domestic Corporations, 2005

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Figure A

Foreign-Controlled Domestic Corporations as a Percentage of All Corporations, Tax Years 1996-2005

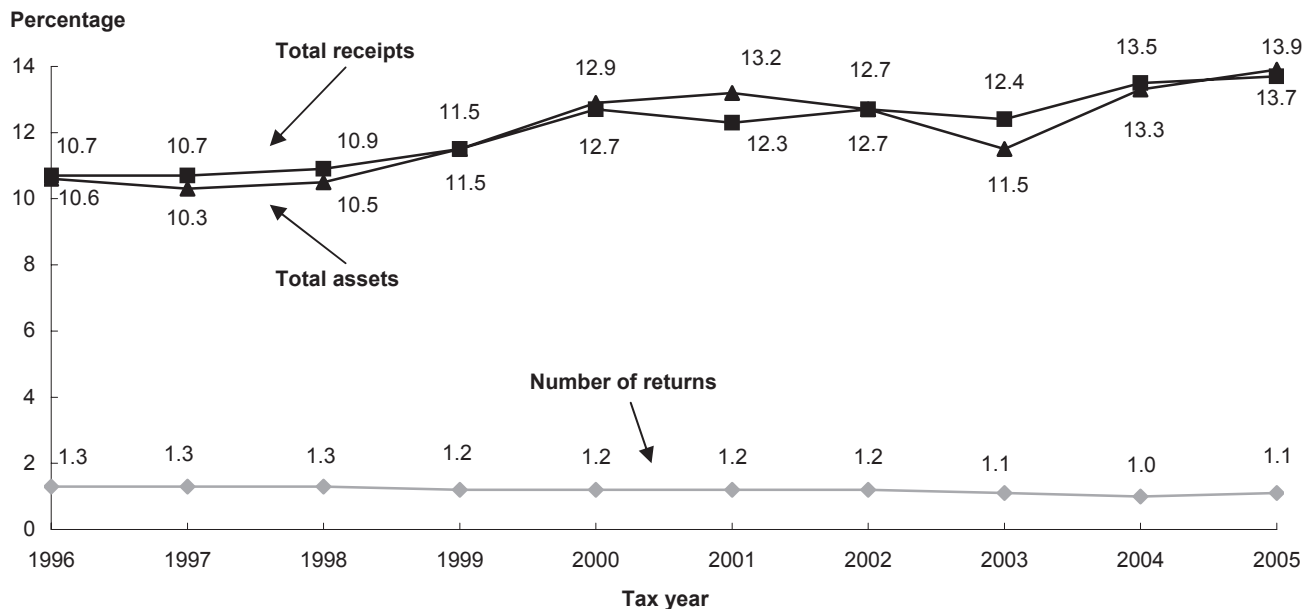


Figure B

Foreign-Controlled Domestic Corporations: Selected Items, by Industrial Sector, Tax Year 2005

[Money amounts are in millions of dollars]

Industrial sector	Returns		Total assets		Total receipts	
	Number	Percentage of total	Amount	Percentage of total	Amount	Percentage of total
	(1)	(2)	(3)	(4)	(5)	(6)
All industries	61,820	100.00	9,218,983	100.00	3,505,629	100.00
Agriculture, forestry, fishing, and hunting	841	1.36	5,164	0.06	2,598	0.07
Mining	696	1.13	100,708	1.09	46,670	1.33
Utilities	76	0.12	95,959	1.04	40,198	1.15
Construction	2,530	4.09	35,480	0.38	41,876	1.19
Manufacturing	7,128	11.53	2,380,069	25.82	1,659,400	47.34
Wholesale and retail trade	19,388	31.36	526,079	5.71	888,086	25.33
Wholesale trade	15,789	25.54	431,167	4.68	713,321	20.35
Retail trade	3,599	5.82	94,913	1.03	174,765	4.99
Transportation and warehousing	2,510	4.06	50,735	0.55	47,882	1.37
Information	2,256	3.65	309,461	3.36	82,855	2.36
Finance and insurance	2,540	4.11	4,370,039	47.40	436,398	12.45
Real estate and rental and leasing	11,571	18.72	106,071	1.15	25,235	0.72
Professional, scientific, and technical services	5,442	8.80	117,966	1.28	64,546	1.84
Management of companies (holding companies)	2,567	4.15	1,002,966	10.88	85,278	2.43
Administrative and support and waste management and remediation services	1,368	2.21	34,494	0.37	33,765	0.96
Educational services	108	0.17	1,369	0.01	1,180	0.03
Health care and social assistance	369	0.60	22,781	0.25	13,448	0.38
Arts, entertainment, and recreation	737	1.19	5,874	0.06	4,171	0.12
Accommodation and food services	1,110	1.80	49,719	0.54	28,097	0.80
Other services	583	0.94	4,045	0.04	3,947	0.11

NOTES: Detail may not add to totals because of rounding. Percentages are computed using rounded data.

Foreign-Controlled Domestic Corporations, 2005

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scientific, and technical services (5,442 returns). By comparison, relatively few FCDCs were involved in educational services (108 returns) or utilities (76 returns). The Data Sources and Limitations section discusses how returns were classified by industry.

Corporations classified as wholesalers accounted for 20.3 percent of the receipts for all FCDCs, a percentage nearly as high as the 25.5 percent of the total returns they comprised. However, these companies reported only 4.7 percent of the total FCDC assets.

Corporations classified in the real estate and rental and leasing industrial sector reported only 1.2 percent of the assets and 0.7 percent of the receipts of all FCDCs. These percentages were both substantially less than the 18.7 percent of the FCDC returns that they filed.

Manufacturing corporations filed 11.5 percent of the FCDC returns for 2005. These capital-intensive goods-producing companies accounted for far greater percentages of the total FCDC assets (25.8 percent) and receipts (47.3 percent). These corporations were often large, with reported average amounts of assets and receipts of \$333.9 million and \$232.8 million, respectively.

Corporations classified in the professional, scientific, and technical services industrial sector reported only 1.3 percent of the assets and 1.8 percent of the receipts of all FCDCs. Both of these percentages are significantly lower than the portion (8.8 percent) of total FCDC returns this services sector represented. This sector is opposite the manufacturing sector in this regard. These service corporations were generally smaller than those in manufacturing, with reported average amounts of assets and receipts of \$21.7 million and \$11.9 million, respectively.

Two additional sectors warrant discussion. While corporations classified in the finance and insurance industrial sector composed only 4.1 percent of the total returns filed by FCDCs for 2005, they accounted for a very large portion of the FCDC assets (47.4 percent). In fact, this was the largest share of the total assets by any of the industrial sectors. Additionally, finance and insurance companies accounted for 12.4 percent of the total FCDC receipts.

Management (or holding) companies contributed a significant portion (10.9 percent) of the FCDC total assets. However, this sector did not account for significant portions of either the number of returns filed by FCDCs, nor the receipts reported by them.

While foreign-controlled domestic corporations accounted for 13.7 percent of the \$25.5 trillion of total receipts reported by all corporations filing U.S. income tax returns for 2005, these companies played disproportionately larger roles in certain industrial sectors. For instance, FCDCs produced substantial portions of the total receipts reported for manufacturing (22.8 percent) and wholesale trade (21.2 percent). Conversely, FCDC involvement in a number of other business activities was relatively low and accounted for a small percentage of the receipts for all companies classified in the following industries: construction (2.9 percent), health care and social assistance (2.5 percent), "other" services (2.1 percent), and agriculture, forestry, fishing, and hunting (1.8 percent). See Figure C.

FCDC industrial data can be tabulated at a more exacting level than those for industrial sectors. In general, sectors are composed of major groups, which in turn are composed of minor industries. For 2005, there were 15 minor industries that each accounted for over \$45 billion of receipts. They were: petroleum manufacturing refineries (\$587 billion), motor vehicles and parts manufacturing (\$289 billion), stock life insurance companies (\$209 billion), motor vehicles and parts wholesalers (\$151 billion), electrical goods wholesalers (\$127 billion), food and beverage retailers (\$95 billion), pharmaceuticals and medicines manufacturing (\$93 billion), securities brokers (\$90 billion), bank holding companies (\$80 billion), furniture and other durable goods wholesalers (\$67 billion), petroleum wholesalers (\$58 billion), professional and commercial equipment wholesalers (\$50 billion), stock property and casualty insurance companies (\$49 billion), metal and mineral wholesalers (\$48 billion), and machinery and equipment wholesalers (\$47 billion). See Figure D.

Companies in different industries often have different financial characteristics. For instance, the relative levels of assets and receipts of companies primarily engaged in wholesale trade differ significantly from those primarily engaged in credit intermediation (e.g., commercial banks, credit card issuers, credit unions, mortgage banks, and savings institutions). FCDC wholesalers produced large amounts of receipts with relatively small amounts of assets (as of the end of their accounting periods), resulting in \$1.65 of receipts for each dollar of assets for 2005. By comparison, credit intermediation companies

Foreign-Controlled Domestic Corporations, 2005

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Figure C

Total Receipts of All Corporations and Foreign-Controlled Domestic Corporations, by Industrial Sector, Tax Year 2005

[Money amounts are in millions of dollars]

Industrial sector	Total receipts		
	All corporations	Foreign-controlled domestic corporations	Percentage
	(1)	(2)	(3)
All industries [1]	25,504,789	3,505,629	13.74
Agriculture, forestry, fishing, and hunting	140,749	2,598	1.85
Mining	314,260	46,670	14.85
Utilities	652,930	40,198	6.16
Construction	1,452,509	41,876	2.88
Manufacturing	7,279,555	1,659,400	22.80
Wholesale and retail trade [2]	6,818,435	888,086	13.02
Wholesale trade	3,371,919	713,321	21.15
Retail trade	3,445,760	174,765	5.07
Transportation and warehousing	687,092	47,882	6.97
Information	1,053,251	82,855	7.87
Finance and insurance	3,301,643	436,398	13.22
Real estate and rental and leasing	316,578	25,235	7.97
Professional, scientific, and technical services	855,508	64,546	7.54
Management of companies (holding companies)	895,322	85,278	9.52
Administrative and support and waste management and remediation services	455,333	33,765	7.42
Educational services	34,297	1,180	3.44
Health care and social assistance	531,900	13,448	2.53
Arts, entertainment, and recreation	87,970	4,171	4.74
Accommodation and food services	438,571	28,097	6.41
Other services	188,875	3,947	2.09

[1] Includes "Not allocable," which is not shown separately.

[2] Includes "Wholesale and retail trade not allocable," which is not shown separately.

NOTES: Detail may not add to totals because of rounding. Percentages are computed using rounded data.

reported large amounts of assets, but relatively small amounts of receipts. These FCDCs produced only \$.06 of receipts for each dollar of assets. See Table 2.

Statistics classified by industry do have certain limitations. For example, FCDCs accounted for 22.8 percent and 21.2 percent of the receipts of all companies classified as manufacturers and wholesalers, respectively. However, these percentages may overstate the FCDC portion of wholesaling and understate the FCDC portion of manufacturing. This is because certain U.S. companies (not foreign-controlled) and their subsidiaries may have been involved in both manufacturing and wholesaling of the same product(s) and reported tax information for these activities on a single (consolidated) income tax return, which was statistically classified under the industry of its principal business activity, that being manufacturing, rather than trade. Conversely, many

FCDCs acted as wholesalers in the United States for products manufactured overseas by their parent, or other related, companies. These foreign-controlled domestic companies were classified in the wholesale trade industrial sector. (See the Data Sources and Limitations section for additional information about industrial classification limitations.)

Country Characteristics

Persons (including individuals, corporations, and other entities) resident in any country throughout the world can control U.S. corporations. As reported on the U.S. income tax returns of the foreign-controlled domestic corporations, the countries represent the geographic location of the foreign owner's place of residence in the case of individuals; and place of incorporation, organization, creation, or administration in the case of corporations or other entities. A for-

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Figure D

Foreign-Controlled Domestic Corporations: Selected Items for Largest Minor Industries, Tax Year 2005

[Money amounts are in millions of dollars]

Minor industry	Number of returns	Total assets	Total receipts	Net income (less deficit)	Net income	Income subject to tax	Total income tax after credits	
							Amount	As a percentage of total receipts
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Petroleum refineries, including integrated (manufacturers)	15	1,014,684	587,112	31,106	31,124	30,594	6,876	1.17
Motor vehicles and parts (manufacturers)	793	418,608	289,453	12,900	15,157	11,756	3,019	1.04
Stock life insurance companies	63	1,423,778	208,591	5,006	6,893	5,323	1,327	0.64
Motor vehicles and motor vehicle parts and supplies (wholesalers)	714	102,900	150,555	5,845	6,143	4,361	1,478	0.98
Electrical goods (wholesalers)	1,245	63,782	126,817	1,440	2,131	1,591	385	0.30
Food and beverage stores (retailers)	43	42,803	95,378	2,172	2,211	1,342	450	0.47
Pharmaceutical and medicine (manufacturers)	106	148,761	93,178	11,563	12,030	11,038	3,202	3.44
Securities brokerage	125	1,147,785	89,970	3,404	3,641	2,184	456	0.51
Offices of bank holding companies	30	943,887	79,883	11,979	11,996	11,486	3,437	4.30
Furniture, sports, toys, recycle, jewelry, and other durable goods (wholesalers)	2,704	29,764	67,038	1,025	1,525	1,136	361	0.54
Petroleum and petroleum products (wholesalers)	325	25,808	57,963	2,049	2,150	1,839	629	1.09
Professional and commercial equipment and supplies (wholesalers)	2,281	27,897	49,629	1,420	1,904	1,413	483	0.97
Stock property and casualty insurance companies	114	339,643	48,579	-280	2,969	1,085	355	0.73
Metal and mineral, except petroleum (wholesalers)	360	28,696	47,512	577	1,125	950	309	0.65
Machinery, equipment, and supplies (wholesalers)	2,478	27,007	46,748	1,447	1,668	1,361	458	0.98

NOTES: This figure includes minor industries with at least \$45 billion of total receipts. These industries are listed by decreasing size of total receipts (column 3). Percentages are computed using rounded data.

eign corporation, or a chain of related foreign corporations, is frequently the owner of a U.S. subsidiary corporation. Because a holding company located in a country different from that of the ultimate owner may directly own the stock of a U.S. affiliate, the country reported on the tax return may not necessarily reflect the country of the ultimate owner. No data on the extent of this potential limitation are available. (See the Data Sources and Limitations section of this article for a brief discussion of the possible limitations of the data classified on a country basis.)

For 2005, residents of 40 countries accounted for nearly nine of every ten domestic corporations classified as 50-percent-or-more controlled by a foreign person. The 55,313 corporations controlled by persons resident in the 40 countries shown in Table 3 accounted for nearly all of the total FCDC financial items, including 99.5 percent of total assets, 99.0 percent of total receipts, 98.8 percent of taxable income, and 98.7 percent of total income tax after credits.

Domestic corporations controlled by persons resident in the United Kingdom reported total receipts of \$719 billion for 2005, an amount larger than that

for any other country. These receipts represented 20.5 percent of the total for all FCDCs. As shown in Figure E, the United Kingdom's share of receipts has substantially increased over the 10-year period beginning with 1996.

For 2005, domestic corporations with owners resident in Japan (\$567 billion), Germany (\$445 billion), the Netherlands (\$431 billion), Canada (\$304 billion), France (\$229 billion), and Switzerland (\$157 billion) also accounted for significant amounts of receipts. Of these six countries, Germany's portion of total receipts increased the most between 1996 and 2005 (from 9.6 percent to 12.7 percent), while the portion for Japan decreased the most (from 26.5 percent to 16.2 percent).

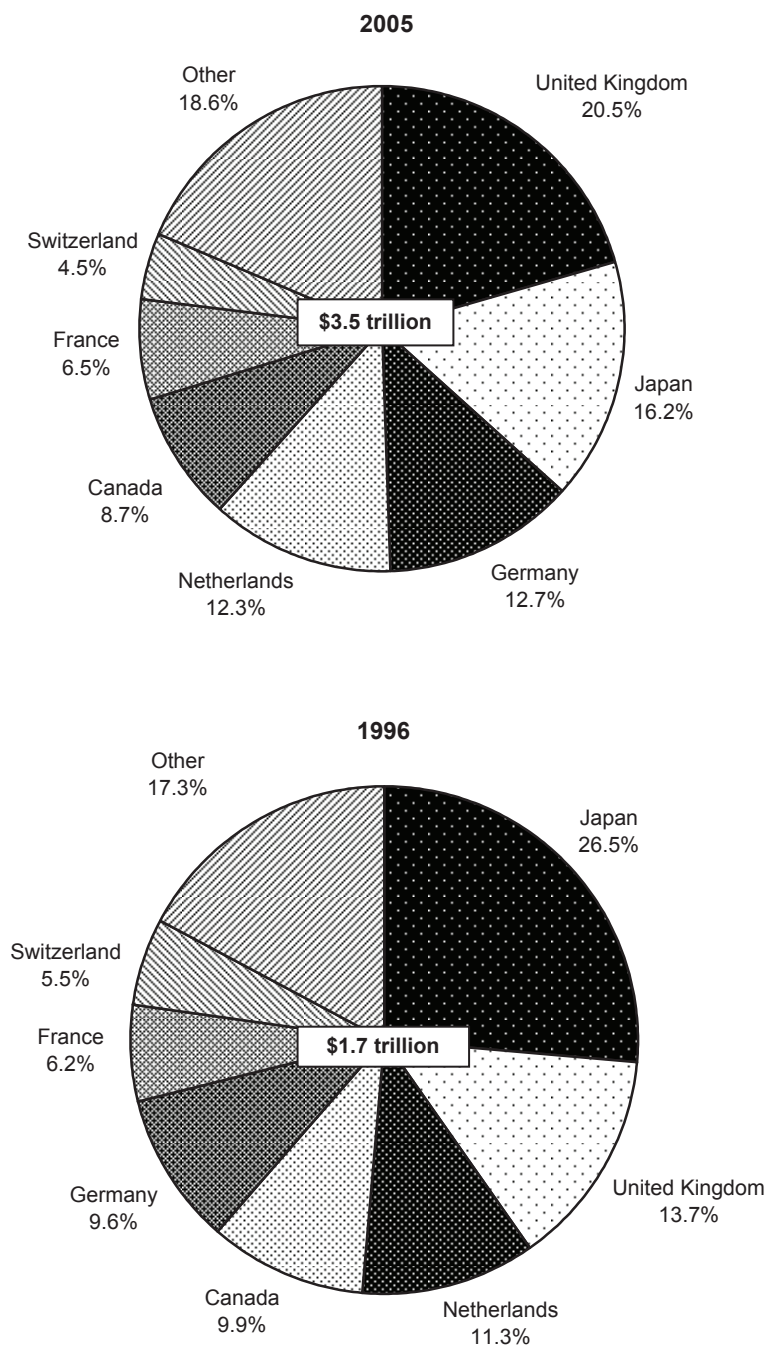
Domestic corporations controlled by persons resident in the United Kingdom accounted for \$2.5 trillion of assets, the largest portion held by any country. Corporations controlled by persons resident in the Netherlands (\$1.4 trillion), Germany (\$1.2 trillion), Canada (\$0.9 trillion), France (\$0.9 trillion), Switzerland (\$0.8 trillion), and Japan (\$0.7 trillion) also accounted for significant amounts of assets.

Foreign-Controlled Domestic Corporations, 2005

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Figure E

Foreign-Controlled Domestic Corporations: Distribution of Total Receipts by Country of Foreign Owner, Tax Years 1996 and 2005



NOTE: All amounts are in current dollars.

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Although U.K.-controlled domestic corporations accounted for the largest part of the total FCDC receipts and assets for 2005, the U.K. was not responsible for the largest number of returns filed for FCDCs. Canadian-controlled domestic corporations filed the most returns, 9,569. Japanese-controlled domestic corporations were second with 4,853 returns; U.K.-controlled domestic corporations were third with 4,281; and German-controlled domestic corporations were fourth with 4,252.

For 2005, U.K.-controlled domestic corporations reported the largest amount of U.S. tax liability (\$11.1 billion). Japanese-controlled corporations, with \$7.8 billion of tax liability, followed. For the U.K.-controlled corporations, tax liabilities were 1.5 percent of the \$0.7 trillion of receipts. Tax liabilities were slightly lower at 1.4 percent of the \$0.6 trillion of receipts for the Japanese-controlled corporations. For all other countries, tax liabilities were 1.1 percent of the \$2.2 trillion of receipts. Many factors, including differences in industrial distributions and age distributions (discussed later in this article), may have caused the resulting differences between countries in calculating tax as a percentage of receipts.

Combined Country and Industry Characteristics

There were some similarities, but also important differences among the primary industrial activities of the corporations with owners from the top seven countries mentioned in the previous section.⁹ For the United Kingdom, manufacturing was the predominant industrial sector with 65.9 percent of the \$719 billion of receipts. More specifically, petroleum and coal products manufacturers produced the most receipts of any major industrial group, accounting for \$362 billion, or 50.3 percent of the country total.

Japanese-controlled corporations were concentrated in two industrial sectors, which produced most of the \$567 billion of receipts: wholesale trade (50.9 percent of the total) and manufacturing (36.9 percent). More specifically, wholesale trade of durable goods was the leading major industrial group, producing 44.6 percent of the total receipts. Japan was the only one of the seven countries in which capital-intensive manufacturing was not the leading industrial sector in producing receipts.

Like those in the United Kingdom, German-controlled corporations were primarily concentrated

in manufacturing with 55.8 percent of the \$445 billion of receipts for that country. More specifically, transportation equipment manufacturers produced the most receipts of any major group, accounting for 30.3 percent of the total. Finance and insurance (14.3 percent) and wholesale trade (13.6 percent) were the other predominant industrial sectors.

For the Netherlands, manufacturing was again the largest industrial sector with 45.1 percent of the total receipts (\$431 billion). This sector was followed by finance and insurance (23.6 percent) and retail trade (13.3 percent). Within manufacturing, petroleum and coal products were the leading industry (with 31.1 percent of total receipts for that country). Insurance carriers reported 21.8 percent of the total receipts. Within the retail trade sector, food, beverage, and liquor stores were the leading industry with 11.2 percent of total receipts for that country.

Canadian-controlled corporations were primarily concentrated in manufacturing with 32.5 percent of the \$304 billion of receipts for that country. This sector was followed by finance and insurance (19.8 percent) and wholesale trade (14.5 percent). Insurance carriers reported 14.9 percent of the total receipts, the only major group in any sector that accounted for at least 10 percent of the total receipts.

France had the same three leading industrial sectors as did Canada, with manufacturers producing 45.0 percent of the \$229 billion of receipts for that country. This was followed by finance and insurance (20.8 percent) and wholesale trade (15.3 percent). More specifically, petroleum and coal products manufacturers produced the most receipts of any major industrial group (14.2 percent of the total), followed by insurance carriers (12.2 percent).

In turn, Switzerland had the same three leading industrial sectors as France. Manufacturing was the predominant sector in the United States for Swiss owners, with 46.3 percent of the \$157 billion of receipts, followed by finance and insurance with 34.7 percent and wholesale trade with 11.8 percent. More specifically, chemical manufacturing was the leading major industry, accounting for 23.2 percent of the total receipts for that country. Other important major industries were businesses that handled securities and commodity contracts and other financial investments (19.0 percent), insurance carriers (15.3 percent), and food manufacturers (11.1 percent).

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Age Characteristics

Table 3 presents data for two groups of FCDCs based on the age of each corporation. A “new” corporation is one with a year of incorporation of 2003 or after reported on its income tax return. An “old” corporation is one incorporated in or prior to 2002, or with an unknown (i.e., unreported) date of incorporation.¹⁰

The year of incorporation may be somewhat unreliable as an indicator of the true age of corporations. For example, a consolidated return may include companies that fall into both the new and old categories. However, the return (including all of the financial information contained in it) was classified into just one of the categories based on the year of incorporation of the parent company. Another example is a reorganization of an existing old corporation into a new corporation that results in it reporting a recent year of incorporation, even though it is an “old” business. An additional limitation is that the year of incorporation is difficult to verify during statistical processing because there are no other items to which it can be compared on a tax return form, and recourse to other sources is not always practical. Thus, it is subject to greater levels of taxpayer reporting and data entry errors.

For 2005, there were 13,548 FCDCs incorporated in 2003 or after. Wholesalers accounted for the greatest portion of these “new” corporations with 4,125 companies, followed by real estate with 2,043 companies and manufacturing with 1,497 companies.

Nearly four out of every five foreign-controlled domestic corporations were incorporated prior to 2003, i.e., considered to be “old” corporations. These corporations tended to be larger than the new corporations, accounting for 95.9 percent of the FCDC assets and 95.1 percent of the receipts.

Old corporations were generally more profitable than the newer corporations. New companies may have had more expenses (including startup costs) relative to receipts than the older companies. For 2005, old corporations reported \$160.2 billion of net profits on \$3.3 trillion of receipts, while new corporations reported \$4.9 billion of net profits on \$0.2 trillion of receipts. Thus, net profits (i.e., net income

less deficit) as a percentage of total receipts were 4.8 percent for old corporations, versus 2.9 percent for new corporations.

As a result of reporting most of the profits, old corporations also accounted for most of U.S. taxable income (95.5 percent) and U.S. tax liabilities (95.4 percent) of all FCDCs. The old corporations had \$40.4 billion of tax liabilities after credits, equaling 1.2 percent of their total receipts. The new corporations had \$2.0 billion of tax liabilities after credits, equaling 1.1 percent of their total receipts.

Receipts, Deductions, and Profits

Total receipts comprises all of the income “actually” received by corporations. (Corporate “constructive” income for tax purposes is discussed below.) These receipts include business receipts, as well as investment and incidental income. Business receipts are gross receipts from sales and operations and frequently make up most of a corporation’s receipts. Investment income includes interest, dividends, and gains on the sale or exchange of both capital and noncapital assets. Interest, in turn, includes both taxable interest from all sources and nontaxable interest on State and local government obligations.

A domestic corporation, whether controlled by a foreign person or not, could have business activities in foreign countries, as well as in the United States. The estimates for total receipts shown in this article include business activities in the United States, as well as certain foreign activities as reported on tax returns of domestic corporations. Total receipts include the receipts of foreign branch operations of U.S. companies. Also included in these receipts are dividends remitted to U.S. corporations by their foreign subsidiaries.

The receipts and deductions of foreign-controlled domestic corporations that are shown in this article do not include amounts generated by their foreign parent or other related foreign companies. However, FCDCs could have had business transactions with their related foreign companies, and FCDC receipts and deductions stemming from these transactions are included in the statistics.¹¹

¹⁰ Dates of incorporation are reported on Form 1120, page 1, question C. Forms 1120L, 1120-PC, 1120-REIT, and 1120-RIC also contain this question in different locations on those forms.

¹¹ For the most recent detailed information on transactions between “foreign-owned domestic corporations” and their related foreign persons, see Jauquet, William P., “Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 2002,” *Statistics of Income Bulletin*, Winter 2005-2006, Volume 25, Number 3. The data contained in that article are not completely comparable to the data contained in this article, since they cover different time periods and are for U.S. corporations that were owned, 25 percent or more, by a foreign person. By contrast, the foreign ownership level used for the FCDC statistics shown in this article was 50 percent or more. Additionally, returns included in the “foreign-owned” study showed total receipts of \$500 million or more and reported transactions with related foreign persons on Form 5472, *Information Return of a 25-Percent Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business*. Neither of these conditions was a requirement for inclusion in the FCDC study.

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An FCDC that transacts business with a related foreign company must determine “transfer prices” for those transactions. These transactions include the sale and purchase of tangible goods, fees for services, interest payments on debts, leasing expenses, and royalties. How transfer prices are determined for these transactions may affect the amount of profits (i.e., net income or deficit), taxable income, and taxes reported on the U.S. income tax return of an FCDC. Section 482 of the Internal Revenue Code, and the related regulations, provide guidance in determining transfer prices. In general, the objective is to use “arm’s length prices,” which means prices that would be used for transactions between independent enterprises and determined by market forces.

Over 87.2 percent of the \$3.5 trillion of total receipts reported by domestic corporations controlled by a foreign person consisted of “business receipts” (i.e., receipts from sales and operations). These same companies reported \$3.3 trillion of total deductions. Cost of goods sold was 67.0 percent of that total. (See “business receipts” and “cost of goods sold” in the Explanation of Selected Terms section.) Complete income statement statistics of FCDCs are shown in Tables 24 and 25 of *Statistics of Income—2005, Corporation Income Tax Returns*.

It is noteworthy to look at the “gross profit” of FCDCs. Gross profit is the difference between business receipts and cost of goods sold. Two important industrial sectors for FCDCs, manufacturing and wholesale trade, accounted for most of the reported amounts of business receipts and cost of goods sold. In manufacturing, all FCDCs reported \$.78 of cost of goods sold for every dollar of business receipts, while the amount was \$.71 for all other corporations classified in this sector. Thus, FCDCs had smaller gross profits than other corporations, \$.22 compared to \$.29 for every dollar of business receipts. In wholesale trade, all FCDCs reported \$.82 of cost of goods sold for every dollar of business receipts. The

amount was the same (\$.82) for all other corporations classified in this sector. As a result, FCDCs and other corporations had similar gross profits, \$.18 for every dollar of business receipts.

Total receipts less total deductions for FCDCs equaled \$160.5 billion for 2005. By comparison, net income (less deficit) amounted to \$165.2 billion. The statistics for total receipts less total deductions include all income actually received by corporations, while the statistics for net income (less deficit) focus on taxable sources of corporate income, including “constructive” taxable income. Thus, unlike total receipts less total deductions, net income (less deficit) includes two items of constructive taxable income from related foreign corporations, and excludes nontaxable interest on State and local government obligations.¹² The two items of constructive taxable income from related foreign corporations are includable income from foreign corporations owned by U.S. shareholders and foreign dividend gross-up. (See “constructive taxable income from related foreign corporations” in the Explanation of Selected Terms section.) For 2005, FCDCs reported \$6.4 billion of constructive taxable income, and received \$1.6 billion of nontaxable interest on State and local government obligations.

Net income (less deficit) for foreign-controlled domestic corporations increased substantially from the \$90.8 billion for 2004, to \$165.2 billion for 2005. In context, net income (less deficit) reported on all corporation income tax returns also increased between 2004 and 2005, from \$1.1 trillion to \$1.9 trillion.

The \$165.2 billion of total FCDC net income (less deficit) were the result of 30,870 corporations collectively reporting \$201.6 billion of positive net income and 30,950 companies reporting \$36.4 billion of deficits.¹³ Thus, nearly one out of every two domestic corporations with foreign owners reported a positive net income for 2005. In comparison, 58.6

¹² In general, the computation of net income (less deficit) can be shown as follows:

Begin With: Total Receipts

(Includes Business Receipts)

Less: Total Deductions

(Includes Cost of Goods Sold)

Equals: Total Receipts Less Total Deductions

Plus: Constructive Taxable Income from Related Foreign Corporations

(Includes Includable Income from Controlled Foreign Corporations and Foreign Dividend Gross-Up)

Less: Nontaxable Interest on State and Local Government Obligations (Included in Total Receipts, above)

Equals: Net Income (Less Deficit)

¹³ The 30,950 companies reporting a deficit may include a small number of “break-even” companies, i.e., those whose receipts and deductions were equal.

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percent of all corporations filing U.S. income tax returns for the same year reported a positive net income.

The percentage of FCDCs reporting positive net income varied greatly among the different industrial groups. At the industrial sector level, the portion reporting positive net income ranged from a low of 12.0 percent for educational services, to a high of 85.5 percent for arts, entertainment, and recreation. For the more predominant sectors of FCDCs, the percentages of profitable companies were 57.1 percent for manufacturing and 52.7 percent for wholesale trade.

The \$36.4 billion of deficits for 2005 could be carried back or forward to other tax years, under prescribed rules, to reduce the taxable income of those years (see “net operating loss deduction” in the Explanation of Selected Terms section). When a company carried back a deficit to a previous tax year, it could file either Form 1120X, *Amended U.S. Corporation Income Tax Return*, or Form 1139, *Corporation Application for Tentative Refund*. Net operating losses carried back to Tax Year 2005 from 2006 and beyond, reported on Forms 1120X and 1139, are not included in the statistics shown in this article. However, NOLs carried forward to Tax Year 2005 from prior years are included in the statistics and discussed in the next section.

Taxable Income and Taxes

For most corporations, taxable income (i.e., “income subject to tax”) is generally equal to positive net income less statutory special deductions.¹⁴ Statutory special deductions include deductions for net operating loss (NOL) carryovers from prior years and the special deductions for dividends and other corporate attributes allowed by the Internal Revenue Code. For 2005, the difference between the \$201.6 billion of positive net income and \$153.0 billion of taxable income was, for the most part, the result of statutory special deductions. The net operating loss deduction was \$29.9 billion and accounted for 61.0 percent of the \$49.0 billion of total statutory special deductions. In calculating taxable income for 2005, FCDCs reduced their positive net incomes by 14.8 percent using NOLs carried over from prior years.

For 2005, foreign-controlled domestic corporations reported \$153.0 billion of taxable income. This was the base on which \$53.1 billion of income tax were computed. The \$53.8 billion of total income tax before credits reported by FCDCs consisted primarily of the income tax, plus the alternative minimum tax and certain other taxes. The alternative minimum tax was \$0.7 billion, and the remaining taxes comprised a very small part of the total.

Tax credits totaling \$11.4 billion reduced the U.S. income tax liability of foreign-controlled domestic corporations from \$53.8 billion to \$42.4 billion for 2005. The largest credits claimed were \$8.1 billion of foreign tax credits, \$2.4 billion of general business credits, and \$0.8 billion of prior-year minimum tax credits. The \$42.4 billion of total U.S. income tax after credits represent the tax liability as originally reported by taxpayers. However, this amount may differ from the actual income tax collected and the final income tax liability of corporations for Tax Year 2005. The originally reported tax liability does not take into account either of the following possible changes: (1) amended returns filed by the corporations, or (2) adjustments made by IRS as a result of tax examination or enforcement activities. Among other reasons, corporations could file amended returns to use carryback provisions for net operating losses and unused foreign tax and general business credits.

The percentage of FCDCs reporting U.S. tax liabilities (i.e., total income tax after credits) for 2005 was 34.6 percent, up slightly from 34.1 percent reported for the previous year. However, the amount of tax liability reported by FCDCs increased to \$42.4 billion for 2005 from \$29.9 billion for 2004, a 41.7-percent increase.

The “Largest” Foreign-Controlled Domestic Corporations

This article defines the largest companies as those with at least \$250 million of total assets, or those that produced at least \$50 million of business receipts. Within the finance and insurance, and management of companies (holding companies) industrial sectors,

¹⁴ There were certain exceptions to the relationship of positive net income minus statutory special deductions equaling taxable income. First, in some cases, the statutory special deductions for dividends received and for dividends paid on certain preferred stock of public utilities exceeded net income. Second, the tax bases of S corporations and life insurance companies were not defined as net income less statutory special deductions. Rather, these types of corporations computed taxable income using special provisions of the Internal Revenue Code. Also, regulated investment companies and real estate investment trusts generally passed their net incomes on to be taxed at the shareholder level; but any taxable amounts not distributed were included in income subject to tax.

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total receipts were used in place of business receipts for selecting the largest companies.

Both size of assets and size of receipts were used to select the largest companies in order to ensure adequate coverage of all industries. As previously discussed, financial structure varies across industries. For instance, companies classified in wholesale trade generally report large amounts of receipts compared to their end-of-year assets. By comparison, credit intermediation corporations generally report large amounts of assets compared to their receipts. If either assets or receipts were used exclusively to select the largest companies, then the largest companies in one of these industrial groups would have been underrepresented in comparison to the other group.

Table 4 shows that there were 19,038 large domestic corporations for 2005. (See the discussion on returns excluded from Table 4, below.) Of this total, foreign persons controlled 3,790 corporations, or 19.9 percent. This percentage is remarkably larger than the 1.1 percent that FCDCs accounted for of all corporations, regardless of size.

The 3,790 large foreign-controlled domestic corporations comprised just 6.1 percent of the number of income tax returns filed by FCDCs. However, these large companies accounted for the majority of the key FCDC financial items, reporting 95.1 percent of the total assets, 94.6 percent of the total receipts, 93.7 percent of the taxable income, and 92.7 percent of the total income tax after credits, of all FCDCs.

There were 15,248 large domestic corporations that did not have controlling foreign owners for 2005. Similar to FCDCs, these large companies also accounted for a small portion of the total number of income tax returns filed by domestic corporations without foreign owners, but did comprise a significant portion of the key financial items (total assets, total receipts, etc.) of this group of returns.

The largest domestic corporations are primarily “old” corporations, with incorporation dates prior to 2003. Of the 3,790 large FCDCs contained in the Tax Year 2005 study, 89.6 percent were old corporations. Large ODCs were similar to the FCDCs in this respect, with old corporations accounting for 89.3 percent of this group of 15,248 corporations. See Figures F1 and F2.

The largest companies generally report profits that are greater than those of the rest of the companies. For 2005, the largest FCDCs reported net prof-

its of \$158.0 billion, 4.8 percent of the companies’ receipts. The smaller FCDCs reported net profits of \$7.2 billion, 3.8 percent of the companies’ receipts.

Table 4 shows data for the largest FCDCs apportioned by industrial sectors. This table also contains data for large domestic corporations that were not foreign-controlled. These “other domestic corporations” (ODCs) were not foreign-controlled or owned (i.e., they were either owned by domestic persons, or no separate foreign person owned 25 percent or more of the corporation’s stock). This definition of other large domestic corporations is used throughout this article, including the data shown in Figures F through H. Thus, domestic corporations with a foreign person who owned between 25 percent and 49 percent of the corporation’s stock are not included in either of the two groups shown in Figures F through H, and Table 4. These corporations are identified from Schedule K of Form 1120 during Statistics of Income processing. However, they are neither FCDCs nor ODCs, as defined.

Data for domestic corporations that filed Forms 1120-REIT (real estate investment trusts), 1120-RIC (regulated investment companies), and 1120S (S corporations) are excluded from the comparisons between large FCDCs and other large domestic corporations shown in Figures F through H, and Table 4. (However, returns filed on these forms are included in the data of other figures and tables contained in this article, as appropriate.) While corporations filing these income tax returns report their incomes, they generally have little or no tax liabilities. Through separate special provisions of the Internal Revenue Code applicable to each of these types of corporations, the incomes of these corporations are generally taxed at the shareholder level. The Explanation of Selected Terms section discusses in greater detail the nature of real estate investment trusts (REITs), regulated investment companies (RICs), and S corporations.

Industry Characteristics

The industrial makeup of the largest foreign-controlled domestic companies is somewhat different from that of other domestic corporations. For 2005, 37.4 percent of the largest FCDCs were classified as manufacturers, while manufacturers made up just 21.6 percent of the largest domestic companies that were not foreign-controlled. Similarly, wholesalers

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Figure F1

"Large" Foreign-Controlled Domestic Corporations: Selected Items and Percentages, by Total Income Tax After Credits as a Percentage of Total Receipts, Tax Year 2005

[Money amounts are in millions of dollars]

Percentage of total income tax after credits divided by total receipts	All returns			Returns of "old" corporations		Total assets		Total receipts	
	Number	Percentage of total	Cumulative percentage	Number	Percentage of all returns	Amount	Average	Amount	Average
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Total	3,790	100.0	N/A	3,396	89.6	8,767,910	2,313	3,317,476	875
Percentage of total income tax after credits divided by total receipts:									
Zero total receipts	4	0.1	0.1	d	d	1,429	357	0	0
Zero percent	1,062	28.0	28.1	933	87.9	1,113,420	1,048	532,674	502
Greater than zero and under 0.5 percent	1,106	29.2	57.3	1,037	93.8	3,130,522	2,830	1,068,417	966
0.5 percent under 1.0 percent	367	9.7	67.0	326	88.8	1,761,862	4,801	639,604	1,743
1.0 percent under 1.5 percent	251	6.6	73.6	229	91.2	288,238	1,148	206,177	821
1.5 percent under 2.0 percent	224	5.9	79.5	212	94.6	579,810	2,588	329,284	1,470
2.0 percent under 3.0 percent	272	7.2	86.7	254	93.4	399,550	1,469	238,797	878
3.0 percent under 4.0 percent	165	4.4	91.1	149	90.3	460,597	2,791	128,121	776
4.0 percent under 5.0 percent	87	2.3	93.4	77	88.5	247,846	2,849	54,700	629
5.0 percent under 7.5 percent	103	2.7	96.1	98	95.1	411,940	3,999	70,654	686
7.5 percent under 10.0 percent	59	1.6	97.6	d	d	137,713	2,334	24,396	413
10.0 percent or more	90	2.4	100.0	81	90.0	234,983	2,611	24,652	274

Percentage of total income tax after credits divided by total receipts	Total deductions	Total receipts less total deductions	Net income (less deficit)			Income subject to tax	Total income tax		
			Total	Net income	Deficit		Before credits	After credits	
								Amount	Average
	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
Total	3,164,170	153,306	157,959	181,513	-23,554	143,404	50,538	39,304	10
Percentage of total income tax after credits divided by total receipts:									
Zero total receipts	0	0	0	0	0	0	0	0	0
Zero percent	552,870	-20,196	-19,905	3,363	-23,268	1,092	310	0	0
Greater than zero and under 0.5 percent	1,031,690	36,725	38,475	38,758	-283	15,192	5,428	1,973	2
0.5 percent under 1.0 percent	611,164	28,440	29,926	29,929	-3	26,087	9,249	5,521	15
1.0 percent under 1.5 percent	194,669	11,508	11,502	11,502	0	9,906	3,487	2,549	10
1.5 percent under 2.0 percent	310,151	19,133	18,814	18,814	0	17,766	6,222	5,855	26
2.0 percent under 3.0 percent	217,401	21,397	21,818	21,818	0	19,703	6,893	5,962	22
3.0 percent under 4.0 percent	113,538	14,583	15,267	15,267	0	14,534	5,081	4,511	27
4.0 percent under 5.0 percent	46,273	8,427	8,466	8,466	0	7,352	2,570	2,462	28
5.0 percent under 7.5 percent	56,563	14,091	14,333	14,333	0	13,307	4,836	4,315	42
7.5 percent under 10.0 percent	17,444	6,953	6,929	6,929	0	6,302	2,205	2,064	35
10.0 percent or more	12,407	12,245	12,334	12,334	0	12,163	4,257	4,092	45

N/A—Not applicable.

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

NOTES: "Large" corporations are those with total assets of \$250,000,000 or more, and/or with business receipts of \$50,000,000 or more (total receipts are used in lieu of business receipts for the finance and insurance, and management of companies sectors). "Old" corporations were those with dates of incorporation prior to 2003, or with unknown dates of incorporation. Data exclude Forms 1120-REIT (real estate investment trusts), 1120-RIC (regulated investment companies), and 1120S (S corporations). Data also exclude returns in which the foreign ownership level is between 25 percent and 49 percent. Detail may not add to totals because of rounding.

were a larger share of the FCDCs (28.0 percent) than of the other large domestic corporations (14.5 percent). Conversely, 13.2 percent of the largest ODCs were classified in finance and insurance, while this sector made up just 8.1 percent of the largest FCDCs. Retailers accounted for 11.4 percent of the largest domestic companies that were not foreign-controlled, while only 3.4 percent of the largest FCDCs were similarly classified. See Figure G for other differ-

ences in the industrial makeup of these two groups of corporations.

FCDCs accounted for 32.4 percent of large wholesalers, 30.1 percent of large manufacturers, 28.5 percent of large real estate and rental/leasing companies, and 25.4 percent of large mining companies. By contrast, just 9.2 percent of large construction companies, 6.8 percent of large retailers, 6.0 percent of large management (holding) companies, and

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Figure F2

"Large" Domestic Corporations Not Foreign Controlled: Selected Items and Percentages, by Total Income Tax After Credits as a Percentage of Total Receipts, Tax Year 2005

[Money amounts are in millions of dollars]

Percentage of total income tax after credits divided by total receipts	All returns			Returns of "old" corporations		Total assets		Total receipts	
	Number	Percentage of total	Cumulative percentage	Number	Percentage of all returns	Amount	Average	Amount	Average
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Total	15,248	100.0	N/A	13,612	89.3	41,072,862	2,694	13,657,411	896
Percentage of total income tax after credits divided by total receipts:									
Zero total receipts	7	[1]	[1]	d	d	3,780	540	0	0
Zero percent	3,708	24.3	24.4	3,251	87.7	3,579,316	965	1,743,214	470
Greater than zero and under 0.5 percent	4,179	27.4	51.8	3,972	95.0	6,559,800	1,570	2,809,968	672
0.5 percent under 1.0 percent	1,371	9.0	60.8	1,261	92.0	2,185,509	1,594	1,698,700	1,239
1.0 percent under 1.5 percent	994	6.5	67.3	929	93.5	3,853,403	3,877	1,198,837	1,206
1.5 percent under 2.0 percent	719	4.7	72.0	663	92.2	5,874,611	8,171	1,704,746	2,371
2.0 percent under 3.0 percent	1,022	6.7	78.7	947	92.7	4,206,322	4,116	1,847,640	1,808
3.0 percent under 4.0 percent	690	4.5	83.2	659	95.5	4,207,295	6,098	975,975	1,414
4.0 percent under 5.0 percent	512	3.4	86.6	d	d	5,556,514	10,853	872,047	1,703
5.0 percent under 7.5 percent	950	6.2	92.8	897	94.4	2,437,478	2,566	462,254	487
7.5 percent under 10.0 percent	574	3.8	96.6	554	97	1,541,460	2,685	199,058	347
10.0 percent or more	522	3.4	100.0	479	91.8	1,067,374	2,045	144,972	278
Percentage of total income tax after credits divided by total receipts	Total deductions	Total receipts less total deductions	Net income (less deficit)			Income subject to tax	Total income tax		
			Total	Net income	Deficit		Before credits	After credits	
	(10)	(11)	(12)	(13)	(14)	(15)	(16)	Amount	Average
Total	12,551,699	1,105,712	1,187,940	1,283,601	-95,661	970,476	341,713	248,097	16
Percentage of total income tax after credits divided by total receipts:									
Zero total receipts	23	-23	-21	2	-23	0	0	0	0
Zero percent	1,824,859	-81,644	-73,401	18,067	-91,467	9,693	3,336	0	0
Greater than zero and under 0.5 percent	2,696,867	113,102	130,163	134,099	-3,937	52,548	19,425	4,359	1
0.5 percent under 1.0 percent	1,620,646	78,053	90,222	90,383	-161	61,688	21,925	12,739	9
1.0 percent under 1.5 percent	1,114,651	84,186	88,138	88,141	-3	60,275	21,211	15,170	15
1.5 percent under 2.0 percent	1,547,475	157,271	170,501	170,501	0	145,622	51,137	29,888	42
2.0 percent under 3.0 percent	1,616,835	230,805	246,891	246,891	0	171,501	59,952	45,587	45
3.0 percent under 4.0 percent	828,517	147,457	148,705	148,731	-27	120,099	42,506	34,665	50
4.0 percent under 5.0 percent	715,262	156,785	166,926	166,968	-41	140,522	49,195	39,155	76
5.0 percent under 7.5 percent	363,094	99,160	100,509	100,509	0	94,874	33,205	28,690	30
7.5 percent under 10.0 percent	142,176	56,882	55,904	55,906	-2	52,672	18,450	17,364	30
10.0 percent or more	81,294	63,678	63,403	63,403	0	60,982	21,371	20,480	39

N/A—Not applicable.

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

[1] Less than 0.05 percent.

NOTES: "Large" corporations are those with total assets of \$250,000,000 or more, and/or with business receipts of \$50,000,000 or more (total receipts are used in lieu of business receipts for the finance and insurance, and management of companies sectors). "Old" corporations were those with dates of incorporation prior to 2003, or with unknown dates of incorporation. Data exclude Forms 1120-REIT (real estate investment trusts), 1120-RIC (regulated investment companies), and 1120S (S corporations). Data also exclude returns in which the foreign ownership level is between 25 percent and 49 percent. Detail may not add to totals because of rounding.

3.9 percent of large health care and social assistance corporations were FCDCs.

Table 4 presents industrial sector-level data for the largest domestic corporations, both foreign- and nonforeign-controlled. Column 43 of this table shows the percentage of returns that reported profits (i.e., positive net income). While 75.3 percent of

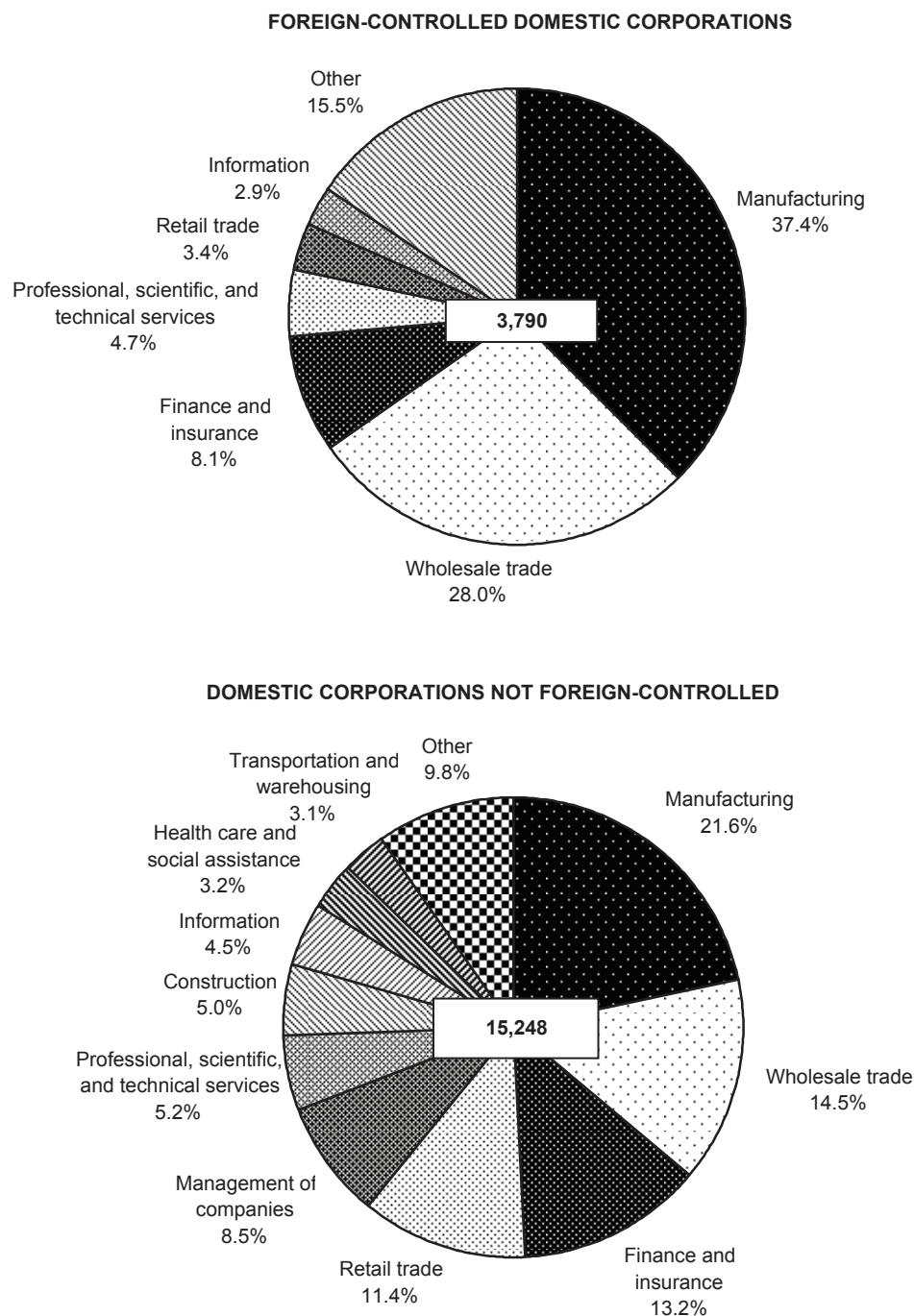
large FCDCs reported profits, 78.3 percent of other large domestic corporations were similarly profitable. There are 19 different industrial sectors shown in the table, treating wholesale trade and retail trade as separate sectors. Because of disclosure considerations, percentages have been suppressed for two FCDC sectors. Of the 17 remaining industrial sectors, other

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Figure G

Distribution of Returns by Industry for "Large" Foreign-Controlled and Other Domestic Corporations, Tax Year 2005



NOTES: "Large" corporations are those with total assets of \$250,000,000 or more, and/or with business receipts of \$50,000,000 or more. (Total receipts are used in lieu of business receipts for the finance and insurance, and management of companies sectors.) Data exclude Forms 1120-REIT (real estate investment trusts), 1120-RIC (regulated investment companies), and 1120S (S corporations). Data also exclude returns in which the foreign ownership level is between 25 percent and 49 percent.

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domestic corporations (ODCs) had higher percentages of profitable companies in 11 sectors. Caution should be used when comparing the percentages for a given sector because not all differences between the percentages are statistically significant. Within each group of corporations, the percentage of corporations that reported a profit varied substantially across the industrial sectors. For this reason, it is important to compare the two types of corporations for a specific industry, rather than for all industries. This will be discussed later in this article, specifically looking at the two key industrial sectors for FCDCs: manufacturing and wholesale trade.

Column 57 of Table 4 shows the ratio of net income (less deficit) to total receipts. Overall, net income (less deficit) as a percentage of receipts for large FCDCs (4.8 percent) was considerably smaller than for ODCs (8.7 percent). Within each group of corporations, the ratio of profits to receipts varied across the industrial sectors. Other domestic corporations had higher ratios of net income (less deficit) to receipts than FCDCs in 14 out of 19 industrial sectors.

Net profits (i.e., net income (less deficit)) is one of the key factors that affect the amount of retained earnings of corporations. Columns 12-14 of Table 4 show corporate total, appropriated, and unappropriated retained earnings, respectively. The amounts of retained earnings were reported in the end-of-year balance sheets of the corporations' books of account. They represent earnings and profits of the corporations retained from normal and discontinued operations of previous years, as well as "extraordinary" gains and losses, and prior period adjustments. The amounts are also after reductions for dividends and distributions made to stockholders. (For a more extensive discussion of retained earnings, see *Statistics of Income—2005, Corporation Income Tax Returns*.) Appropriated retained earnings were earnings set aside for specific purposes, such as reserves for plant expansion or bond retirements, and not available for distribution to stockholders. For 2005, the largest FCDCs reported a *negative* \$23.5 billion of total retained earnings, while other large domestic corporations reported \$3.4 trillion of *positive* retained earnings. Retained earnings is a component of net worth

and thus affects the ratio of net income (less deficit) to net worth, which is shown in column 56 of Table 4.

The ratio of taxable income (i.e., "income subject to tax") to total receipts is shown in column 61 of Table 4. This ratio, unlike the ratio of net income (less deficit) to total receipts discussed earlier, excludes deficits, and includes the amount of statutory special deductions reported on tax returns.

FCDCs generally had lower ratios of taxable income to receipts than those of other domestic corporations, 4.3 percent for FCDCs versus 7.1 percent for ODCs for all industries. For each group of large corporations, the ratio of taxable income to receipts varied among the different industrial sectors. Of the 17 different industrial sectors shown in the table (data for two FCDC sectors have been suppressed), ODCs had higher taxable income as a percentage of receipts in 13 sectors.

Table 4 also includes the ratio of total U.S. income tax after credits to total receipts (column 64). The total income tax after credits reported by both FCDCs (\$39.3 billion) and ODCs (\$248.1 billion) represents the tax liability of these companies as reported on their originally filed U.S. income tax returns (see column 42).

In using total income tax after credits as a percentage of total receipts, it should also be noted that a small portion of total income tax after credits (for example, the tax recapture of prior-year investment credits) does not relate to the current-year total receipts reported by corporations. However, this is not considered to be a major limitation in using the percentage because the regular income tax and the alternative minimum tax represented about 99 percent or more of the total income tax for both FCDCs and ODCs.

The ratio of tax to receipts shown in column 64 of Table 4 takes into account only the U.S. tax liabilities of the corporations. Additional data would be required to examine the worldwide tax liabilities of the corporations, which are beyond the scope of this article.¹⁵

Before looking at total income tax after credits for specific industries, it is useful to examine the amount of tax liability as a percentage of the total re-

¹⁵ One focus of this article is U.S. total income tax after credits. The reader might choose to focus instead on total worldwide taxes, which may be approximated by adding the foreign tax credits claimed by corporations to the U.S. tax liabilities (i.e., total income tax after credits) of these corporations. There are limitations in using this procedure, and the foreign tax credit only approximates the foreign tax liabilities of the corporations. Table 4 shows amounts of foreign tax credits in addition to U.S. total income tax after credits. For the most recent statistics covering corporate foreign tax credits in depth, see Luttrell, Scott, "Corporate Foreign Tax Credit, 2004," in this issue of the *Statistics of Income Bulletin* (Summer 2008, Volume 28, Number 1). In addition, foreign tax credit data are included on the IRS Internet site at www.irs.gov, under Tax Stats.

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ceipts for all large domestic corporations. Figures F1 and F2 present such data classified by 12 categories of this percentage. For 2005, Figure F1 shows that large FCDCs reported \$39.3 billion of total income tax after credits, 1.2 percent of their total receipts. Column 3 of Figure F1 shows that 28.1 percent of FCDCs had no U.S. tax liabilities, that 67.0 percent of the companies had tax liabilities of less than 1.0 percent of their receipts, and that 91.1 percent of the companies had tax liabilities of less than 4.0 percent of their receipts. By comparison, Figure F2 shows that large domestic corporations not foreign-controlled reported \$248.1 billion of total income tax after credits, 1.8 percent of their total receipts. For these companies, 24.4 percent had no tax liabilities, 60.8 percent had tax liabilities of less than 1.0 percent of their receipts, and 83.2 percent had tax liabilities of less than 4.0 percent of their receipts.

FCDCs claimed smaller amounts of credits than ODCs in relative terms. For 2005, large FCDCs claimed \$11.2 billion of credits, equaling 22.2 percent of their income tax liabilities before credits. Other large domestic corporations claimed \$93.6 billion of credits for the same tax year, equaling 27.4 percent of their income tax liabilities before credits. The largest credit claimed by each group of corporations was the foreign tax credit, \$7.9 billion by large FCDCs and \$72.5 billion by other large domestic corporations.

Overall, while large FCDCs reported average tax liabilities after credits of \$1.18 per \$100 of receipts (or 1.2 percent), other domestic corporations reported tax liabilities after credits of \$1.82 per \$100 of receipts (or 1.8 percent). Of the 17 different industrial sectors shown in Table 4 (data for two FCDC sectors have been suppressed), ODCs had higher tax to receipts ratios in 13 sectors.

Table 4 highlights once again the differences in financial characteristics of different industries. For instance, looking at large FCDCs, finance and insurance companies have a slightly higher ratio of net income (less deficit) to receipts (3.6 percent) than do wholesalers (3.4 percent); see column 57. However, when total assets are used as the denominator in place of total receipts (column 55), the difference is substantial and reversed (the largest FCDCs in finance and insurance have a 0.4 percentage, and those in wholesale trade have a 5.5 percentage). Because the distribution of industrial activities based on principal businesses is not the same for the largest

FCDCs as it is for ODCs, this, again, illustrates the importance of comparing the two groups of corporations on an industrial basis. This article will now look at two specific industrial sectors that are important to FCDCs: manufacturing and wholesale trade.

Manufacturing was a significant industrial sector for large FCDCs, accounting for nearly one-half of the total receipts of the group of corporations. Both large FCDCs and ODCs were primarily “old” corporations; 89.8 percent of FCDCs and 91.0 percent of ODCs were incorporated before 2003. Large ODC manufacturers had higher percentages than those of large FCDC manufacturers in each of the four calculations previously discussed. Specifically, the percentage of ODCs in this industrial sector that reported positive profits was higher, but somewhat similar to that for the FCDCs, 74.5 percent and 72.5 percent, respectively (see column 43 of Table 4). Looking at the actual amounts of those positive profits and also accounting for losses reported by the remaining companies, the percentage of net income (less deficit) to total receipts was significantly higher for ODCs, 11.8 percent, than it was for FCDCs, 5.1 percent (see Figure H and column 57 of Table 4). Similarly, large manufacturing ODCs reported taxable incomes of 7.7 percent of their receipts, while the percentage for FCDCs was smaller at 4.7 percent (see column 61 of Table 4). The ratios of total income tax after credits to total receipts for ODCs and FCDCs were 1.4 percent and 1.2 percent, respectively (see column 64 of Table 4). The similarity of these tax to receipts ratios is partially explained by the difference in the amounts of credits that the two groups of corporations reported. ODCs reported larger credits than did the FCDCs, thereby reducing their postcredit tax liabilities by a larger portion. ODCs reported credits equaling 46.8 percent of their precredit income tax liabilities. For FCDCs, the percentage was substantially less, at 28.3 percent. For both groups of corporations, foreign tax credits accounted for most of the total credits.

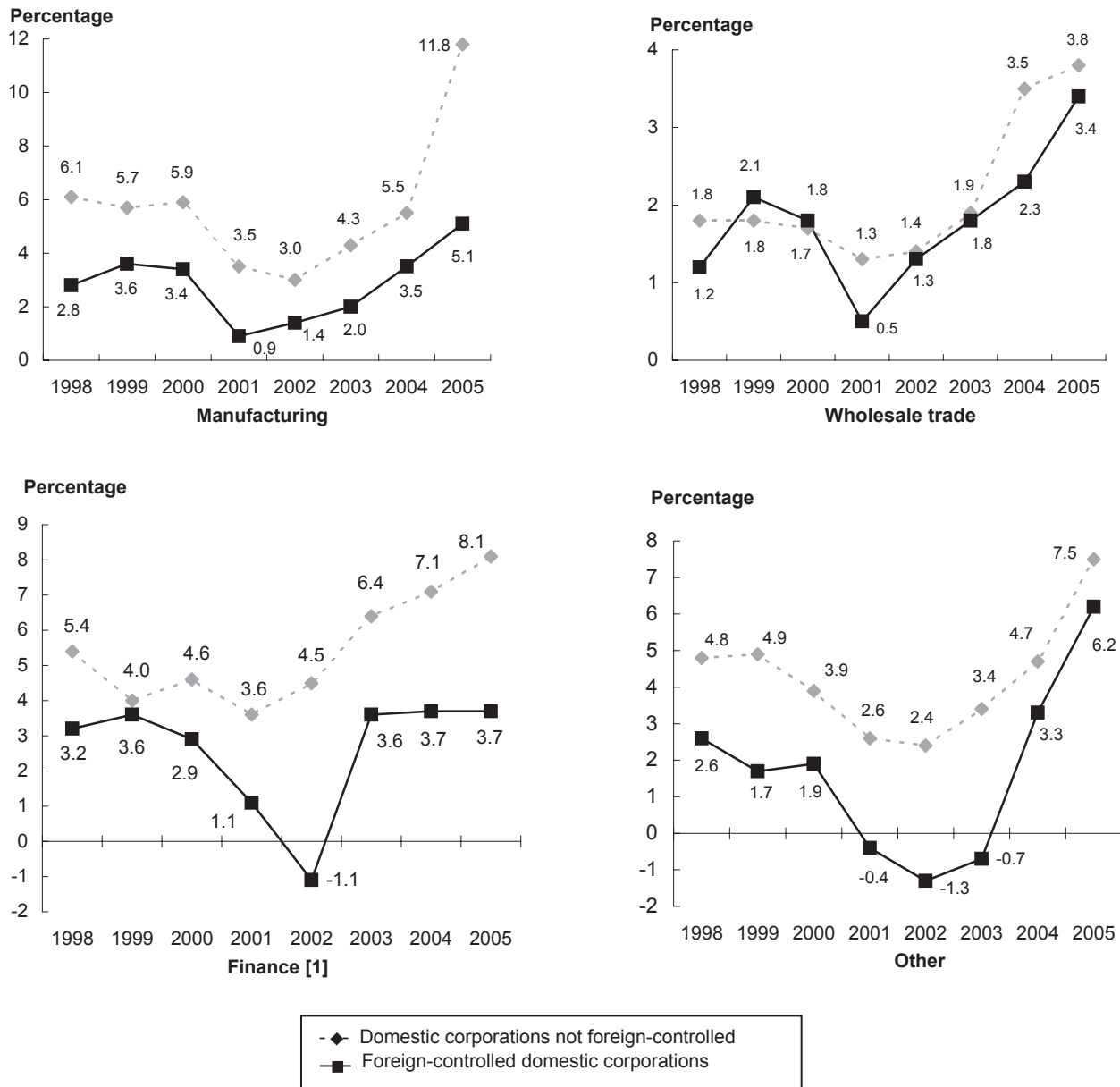
Wholesale trade was also a significant industrial sector for large FCDCs, accounting for 19.5 percent of the total receipts of the group of corporations. Most large FCDCs (93.9 percent) and ODCs (94.5 percent) were “old” corporations, incorporated before 2003. The percentage of ODCs in this industrial sector that reported positive profits was higher, but again similar to that for the FCDCs, 85.3 percent and 82.6 percent, respectively. Looking at the actual amounts of those positive profits and also accounting for loss-

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Figure H

"Large" Domestic Corporations: Net Income (Less Deficit) as a Percentage of Total Receipts, by Control Status and Industry, Tax Years 1998-2005



[1] Includes returns classified in the "finance and insurance" and "real estate and rental and leasing" industrial sectors of the North American Industry Classification System.

NOTES: "Large" corporations are those with total assets of \$250,000,000 or more, and/or with business receipts of \$50,000,000 or more. (Total receipts are used in lieu of business receipts for the finance and insurance, and management of companies sectors.) Data exclude Forms 1120-REIT (real estate investment trusts), 1120-RIC (regulated investment companies), and 1120S (S corporations). Data also exclude returns in which the foreign ownership level is between 25 percent and 49 percent.

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es reported by the remaining companies, the percentage of net income (less deficit) to total receipts was slightly higher for ODCs (3.8 percent) than it was for FCDCs (3.4 percent). Large wholesale ODCs reported taxable incomes of 3.2 percent of their receipts, while the percentage was 2.9 percent for FCDCs. The final ratio of total income tax after credits to total receipts shows the ODC and FCDC percentages being equal, at 0.9 percent. These last percentages are once again impacted by the amount of credits claimed by both groups of corporations. ODCs reported much larger credits than did the FCDCs, thereby reducing their postcredit tax liabilities by a larger portion. ODCs reported credits equaling 18.3 percent of their precredit income tax liabilities. For FCDCs, the percentage was much smaller, at just 7.9 percent. For both groups of corporations, foreign tax credits accounted for the largest share of the total credits.

Summary

Foreign investment and activity in the United States through FCDCs grew for Tax Year 2005. FCDCs reported \$3.5 trillion of total receipts for the year, a 14.7-percent increase over the 2004 level. Total receipts reported on all U.S. corporation income tax returns increased by 12.3 percent from the previous year. As a result, the share of total corporate receipts accounted for by FCDCs increased from 13.5 percent to 13.7 percent.

FCDC assets grew for 2005, as did the assets for all corporations. FCDC assets totaled \$9.2 trillion for 2005, a 15.7-percent increase from the previous year. By comparison, all corporations reported a total of \$66.4 trillion of assets for 2005, a 10.5-percent increase over the previous year. FCDCs accounted for 13.9 percent of total corporate assets for 2005, up from 13.3 percent for the previous year.

The number of returns filed by FCDCs increased by 6.7 percent for 2005, to 61,820. FCDCs accounted for only 1.1 percent of all corporation income tax returns filed for the year. This percentage is much smaller than the percentages of receipts and assets that FCDCs produced.

Two of the 19 industrial sectors, manufacturing and wholesale trade, generated more than two-thirds of the \$3.5 trillion of total FCDC receipts. Manufac-

turers produced \$1.7 trillion of receipts, while wholesalers accounted for an additional \$0.7 trillion.

Domestic corporations controlled by persons in the United Kingdom reported total receipts of \$0.7 trillion, 20.5 percent of the FCDC total. In addition, FCDCs owned by persons in Japan (16.2 percent), Germany (12.7 percent), the Netherlands (12.3 percent), Canada (8.7 percent), France (6.5 percent), and Switzerland (4.5 percent) accounted for significant portions of receipts.

Corporate profits were substantially larger than those of the previous year. The collective net income (less deficit) reported by foreign-controlled domestic corporations increased from \$90.8 billion for 2004 to \$165.2 billion for 2005. To place the performance of FCDCs in context, total corporate profits also increased from \$1.1 trillion for 2004 to \$1.9 trillion for 2005.

The U.S. tax liability of FCDCs (i.e., total income tax after credits) moved in the same direction as did profits, increasing from \$29.9 billion for 2004 to \$42.4 billion for 2005, or by 41.7 percent. To place this in perspective, the 2005 U.S. tax liabilities of all corporations were 39.1 percent more than the previous year.

Of the 61,820 foreign-controlled domestic corporations, the 3,790 "largest" companies accounted for most of the total amounts of key financial items (e.g., 95.1 percent of the total assets, 94.6 percent of the total receipts, 93.7 percent of the taxable income, and 92.7 percent of the total income tax after credits).

In comparing the 3,790 large foreign-controlled domestic corporations to the 15,248 other large domestic companies on the basis of industry, FCDCs had lower percentages than ODCs in most sectors using each of the following four criteria: (1) percentage of corporations that reported profits, (2) percentage of net income (less deficit) to total receipts, (3) percentage of taxable income to total receipts, and (4) percentage of total income tax after credits to total receipts.

While this article has been able to compare several key ratios related to the profits and taxes reported by foreign-controlled domestic corporations and other domestic corporations on the same bases of size and industry, additional research is needed to explain the differences in those ratios.¹⁶

¹⁶ For additional information, see "Tax Administration: Comparison of the Reported Tax Liabilities of Foreign- and U.S.-Controlled Corporations, 1996-2000," U.S. General Accounting Office, GAO-04-358, February 2004. Also, see Grubert, Harry, "Another Look at the Low Taxable Income of Foreign-Controlled Companies in the United States," U.S. Department of the Treasury, Office of Tax Analysis, Paper 74, 1997; and Mataloni, Raymond J., Jr., "An Examination of the Low Rates of Return of Foreign-Owned U.S. Companies," U.S. Department of Commerce, Bureau of Economic Analysis, *Survey of Current Business*, March 2000.

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Explanation of Selected Terms

The following are brief explanations of some of the terms used in this article. For more extensive definitions, see *Statistics of Income—2005, Corporation Income Tax Returns*, IRS Publication 16.

Alternative Minimum Tax—This tax was designed to ensure that a taxpayer with substantial economic income would not avoid significant tax liability through a legitimate use of exclusions, deductions, and credits. In effect, it provided a second tax system that curtailed or eliminated many of the means of reducing taxes allowed in the regular tax system and taxed the resulting alternative taxable income at a reduced rate. The AMT is included in the amounts reported for both total income tax before (and after) credits.

Balance Sheets—The balance sheet data presented in this article were the amounts reported by the taxpayer as of the end of the taxpayer's accounting year. Taxpayers were instructed to provide data that agreed with their books of account but were given very few other guidelines. Since balance sheet data were from the taxpayer's books, they were generally governed by general accounting principles rather than the special rules of tax accounting. A number of steps were taken during statistical processing to reduce the variability due to taxpayer reporting practices. Misreported amounts were transferred to their proper accounts. Missing balance sheets were either supplied from reference books or statistically imputed based on other data and the company's characteristics. Some balance sheets were suppressed for final returns of corporations going out of existence and for most part-year returns (because the same company's end-of-year data could have been subject to inclusion from its full-year return).

Business Receipts—These receipts were, in general, the gross operating receipts of the corporation reduced by the cost of returned goods and allowances. They represented all of a corporation's receipts except investment and incidental income. Business receipts also exclude gains from the sale of assets. Some corporations reported sales and excise taxes as part of their gross receipts from sales (and deducted these taxes as part of "cost of goods sold" or as "taxes paid"); others reported their receipts after adjustment for these taxes. Business receipts in-

clude rents reported by real estate operators and other corporations for which rent made up a significant portion of income. The latter corporations included manufacturers that rented their products, lessors of public utility facilities, and companies engaged in rental services, such as lodging places and the rental of automobiles. Business receipts include such banking items as fees, commissions, and credit card income. Interest, the principal operating income of banking and financial institutions, was excluded from business receipts; rather, it was included in the separate statistics for interest received. Also, premium income of most insurance companies was included in business receipts. Security dealers included profits from security trades in business receipts.

Constructive Ownership Rules—The constructive ownership rules of Internal Revenue Code (IRC) section 318 apply in determining if a U.S. corporation is foreign-owned. However, if a corporation is owned by two or more "unrelated" foreign persons, neither of which owned 50 percent or more of the corporation, then that corporation was excluded from the FCDC statistics even though, together, these persons may have met the 50-percent-or-more ownership criterion. See also, Foreign Person, defined below.

Constructive Taxable Income from Related Foreign Corporations—This item is the sum of includable income from Controlled Foreign Corporations (CFCs) and foreign dividend gross-up. IRC sections 951-964 ("Subpart F") created an exception to the general rule that the earnings and profits of CFCs were subject to U.S. taxation only when the income was actually distributed to U.S. shareholders.¹⁷ Under Subpart F, some types of foreign income are required to be included in the income of the U.S. shareholders, although not actually distributed. This includable income comprises passive investment income, income from sources thought especially easy to shift between tax jurisdictions, and income from sources contrary to public policy. Foreign dividend gross-up is constructive taxable income to corporations that claim a foreign tax credit. A U.S. corporation could claim a foreign tax credit for a share of the foreign taxes actually paid by its related foreign corporations. The share of foreign taxes was treated as deemed paid by the U.S. corporation. In order to receive credit against U.S. tax, the foreign taxes

¹⁷ For the most recent statistics covering CFCs, see Masters, Mike and Catterson Oh, "Controlled Foreign Corporations, 2002," *Statistics of Income Bulletin*, Spring 2006, Volume 25, Number 4. In addition, CFC data are included on the IRS Internet site at www.irs.gov, under Tax Stats.

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deemed paid need to be included in the corporation's worldwide income. The dividend gross-up, which is the equivalent amount of the foreign taxes deemed paid by the U.S. corporation, is included as income of the U.S. corporation.

Cost of Goods Sold—This item generally consisted of the costs incurred by corporations in producing the goods or providing the services that generated the business receipts. Included were costs of materials used in manufacturing; costs of goods purchased for resale; direct labor; and a share of overhead expenses, such as rent, utilities, supplies, maintenance, and repairs. For statistical processing purposes, however, certain items (such as advertising, amortization, bad debts, compensation of officers, depletion, depreciation, interest paid, taxes, and contributions to charitable organizations, employee benefit programs, and pension plans) reported by taxpayers in cost of goods sold schedules were transferred to their respective and separate deduction categories.

Current and Noncurrent Assets—In this article, current assets plus noncurrent assets equal total assets. Table 4 of this article includes separate data for current assets and noncurrent assets. Current assets include cash, notes and accounts receivable (less the allowance for bad debts), inventories, investments in government obligations, tax-exempt securities, and other current assets, such as short-term prepaid expenses and nontrade receivables. Noncurrent assets include loans to stockholders, mortgage and real estate loans, other investments, depreciable assets (less accumulated depreciation), depletable assets (less accumulated depletion), land, intangible assets (less accumulated amortization), and other assets, including those not identified on the tax return as either current or long-term.

Current and Noncurrent Liabilities—In this article, current liabilities include accounts payable; mortgages, notes, and bonds payable in less than 1 year; and other current liabilities, such as accrued taxes, payrolls, and other expenses. Noncurrent liabilities include loans from stockholders; mortgages, notes, and bonds payable in 1 year or more; and other liabilities, including those not identified on the tax return as either current or long-term.

Foreign Person—A foreign person (or entity) includes: (1) a foreign citizen or nonresident alien, (2) an individual who is a citizen of a U.S. possession (but who is not a U.S. citizen or resident), (3) a foreign corporation, (4) a foreign partnership, (5) a for-

eign estate or trust within the meaning of IRC section 7701(a)(31), and (6) a foreign government (or one of its agencies or instrumentalities) to the extent that it is engaged in the conduct of a commercial activity as described in IRC section 892.

Foreign Tax Credit—Although the United States taxes the worldwide income of U.S. persons (including corporations), foreign source income is often taxed as well by the country where the income is earned. The foreign tax credit provisions were enacted to mitigate the potential impact of the double taxation of foreign-source income. U.S. persons are allowed a credit against U.S. income tax for income taxes paid (or accrued) to foreign countries or U.S. possessions, subject to a limitation that prevented corporations from using foreign tax credits to reduce U.S. tax liability on U.S.-sourced income. A corporation that claimed the foreign tax credit could not also claim a business deduction for the same foreign taxes paid. The foreign tax credit was not allowed for taxes paid to certain foreign countries whose governments were not recognized by the United States, with which the United States severed or did not conduct diplomatic relations, or which provided support for international terrorism.

Income Subject to Tax—For most corporations, income subject to tax, i.e., taxable income, consisted of (positive) net income minus certain statutory special deductions. However, there were special provisions in the Internal Revenue Code for determining the taxable income of S corporations and insurance companies.

Income Tax—This item was the amount of a corporation's tax liability calculated at the regular corporate tax rates. It is included in the amounts reported for both total income tax before (and after) credits.

Interest—This item is taxable interest, a component of total receipts. It includes interest on U.S. Government obligations, loans, notes, mortgages, corporate bonds, bank deposits, and dividends from savings and loans and mutual savings banks. This item does not include interest received from certain government obligations not subject to U.S. income tax, including those issued by States, local governments, the District of Columbia, and U.S. possessions.

Net Income (or Deficit)—This is a company's net profit or loss from taxable sources of income reduced by deductions allowed by the Internal Revenue Code. It reflects not only actual receipts, but "construc-

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tive” receipts as well (i.e., includable income from Controlled Foreign Corporations and the foreign dividend “gross-up”). Tax-exempt interest on State and local government obligations is excluded from this item, but is included in “total receipts.” The deductions include ordinary and necessary business deductions, but do not include statutory special deductions. The statistics for (positive) net income are generally larger than those for “income subject to tax” because the latter is reduced by the amount of statutory special deductions, including the net operating loss deduction. In this article, for a group of returns, this item may be referred to as either “profits” (i.e., net income exceeds deficits) or “losses” (deficits exceed net income). On Form 1120, net income (or deficit) was reported on page 1, line 28, entitled “Taxable income before net operating loss deduction and special deductions.”

Net Operating Loss Deduction (NOLD)—A statutory “net operating loss” (NOL) for a given tax year could be carried back, in general, 2 years to reduce the taxable income of those years. Similarly, any amount of the NOL not offset against income during that time could be carried forward to offset income for a period not exceeding 20 years. A “net operating loss” is calculated using the laws and IRS regulations in effect for a given tax year, and is the excess of allowable deductions over taxable income, with certain adjustments. The amount of the deduction included in the statistics of this article, however, consists only of losses from prior years carried forward and actually used to reduce taxable income for the current (2005) tax year. Losses incurred after Tax Year 2005 and carried back to that year at a later date were not reported on the tax returns used for this article. Net operating losses on which the 2005 deduction was based include: (1) the excess of ordinary and necessary business expenses over income for previous loss years, and (2) statutory special deductions claimed in a loss year for dividends received and for dividends paid on certain preferred stock of public utilities (or any excess of such deductions over net income).

Net Worth—This item represented the stockholders’ equity in the corporation, i.e., total assets less the claims of creditors. It is the net sum of

capital stock, additional paid-in capital, appropriated retained earnings, and unappropriated retained earnings (including adjustments to shareholders’ equity), minus the cost of treasury stock. Adjustments to shareholders’ equity could be either positive or negative, and included unrealized gains and losses on securities held “available for sale.” Treasury stock is common or preferred stock originally issued by the corporation that has been reacquired and held at the end of the accounting period by the issuing corporation.

Number of Returns—The data contained in this article include the number of returns filed for Tax Year 2005. For simplicity, the number of returns is sometimes referred to in this article as the number of corporations. However, the actual number of corporations may be larger than the number of returns because most domestic corporations could elect to file consolidated income tax returns. These returns were filed by common parent corporations and contained combined financial data of two or more affiliated domestic corporations meeting certain stock ownership requirements. Each consolidated return was treated for statistical purposes as a single unit.

Real Estate Investment Trusts—Domestic corporations, trusts, and associations that meet certain ownership, purpose, income, and diversification requirements may elect to be taxed as real estate investment trusts (REITs). Foreign-controlled domestic corporations can be REITs. However, REITs played a much larger role for ODCs than for FCDCs.¹⁸ REITs generally invest in real estate and mortgages. A beneficial ownership of the trust is established through transferable shares or transferable certificates of beneficial interest. Among the income requirements, at least 95 percent of the total gross income of a REIT must come from dividends; interest; rents from real property; and gains from the sale of stock, securities, and real property; etc. Additionally, at least 75 percent of total gross income must be derived from rents from real property; interest on mortgages on real property; gains from sales of real property and mortgages; and dividends and gains from the sale of transferable shares in other REITs; etc. The tax liability of REITs is generally very low. This is because, through a statutory special deduction for dividends paid, REITs are not taxed on amounts

¹⁸ Shown in Appendix A of this article are Tax Year 2005 data for all REITs, RICs, and S corporations, regardless of size, filed by foreign-controlled domestic corporations (FCDCs) and by other domestic corporations (ODCs).

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distributed to shareholders. In general, REITs must distribute to their shareholders at least 90 percent of their taxable incomes. Such distributions are taxed to the shareholders (i.e., beneficiaries).

Regulated Investment Companies—A regulated investment company (RIC) is a domestic corporation registered with the Securities and Exchange Commission as a management company, business development company, unit investment trust, common trust fund, or a similar fund. Typically, it is a mutual fund. Foreign-controlled domestic corporations can be RICs. However, RICs played a much larger role for ODCs than for FCDCs.¹⁸ A RIC must meet certain Internal Revenue Code requirements, including deriving at least 90 percent of its gross income from dividends, interest, payments related to securities loans, and gains from the sale of stock or securities, foreign currencies, or other income related to its business of investing in such stock, securities, or currencies. The tax liability of RICs is generally very low. This is because, through a statutory special deduction for dividends paid, RICs are not taxed on amounts distributed to shareholders. In general, RICs must distribute to their shareholders at least 90 percent of their taxable incomes. Such distributions are taxed at the shareholder level.

S Corporations—An S corporation has elected to be taxed through its shareholders under Internal Revenue Code section 1362. The IRC contains restrictive criteria that a company must meet in order to qualify as an S corporation, which include the number and types of shareholders. These companies are involved in numerous industrial activities. They report corporate income and deductions from their conduct of trades and businesses, but generally allocate any income or loss to their shareholders to be taxed only at the individual level. S corporations comprise a very large part of the corporate population. However, foreign-controlled domestic corporations cannot elect to be treated as S corporations.¹⁸

Statutory Special Deductions—In general, net income less statutory special deductions equals income subject to tax. This item is the sum of: (1) deductions for net operating loss carryovers from prior years, and (2) special deductions for dividends and other corporate attributes allowed by the Internal Revenue Code, which includes: (a) dividends received deductions, (b) deductions for dividends paid on certain stock of public utilities, (c) deductions for dividends paid by regulated investment companies

and real estate investment trusts, (d) Internal Revenue Code section 857(b)(2)(E) deductions reported by real estate investment trusts, and (e) Code section 806(a) small life insurance company deductions. These deductions were in addition to ordinary and necessary business deductions.

Total Assets—This item represented those assets reported in the end-of-year balance sheets of the corporations' books of account. Total assets were net amounts after reduction by accumulated depreciation, accumulated amortization, accumulated depletion, and the reserve for bad debts.

Total Income Tax Before and After Credits—For 2005, total income tax of FCDCs was primarily comprised of the income tax imposed on corporate income subject to tax (98.7 percent of the total tax). The alternative minimum tax accounted for 1.3 percent of the total. A small number of corporation income tax returns without net income reported amounts of income tax. The income tax, in these cases, resulted from special provisions of the Internal Revenue Code applicable to life insurance operations. Additionally, some taxes included in total income tax were not imposed directly on a corporation's income subject to tax, such as the recapture taxes. Thus, a small number of corporations without net income and income tax may have reported such taxes on their income tax returns. These taxes were included in the statistics for total income tax. Also included in total income tax were personal holding company taxes and the taxes on undistributed net capital gains of regulated investment companies. Total income tax included an adjustment that could be either positive or negative. This adjustment was used for write-in amounts on the tax computation schedule (e.g., Schedule J of Form 1120), as well as for differences in total tax reported on the tax computation schedule and reported on the tax and payments section of the tax return (e.g., Page 1 of Form 1120). For 2005, the credits used to reduce the total income tax of FCDCs primarily included the foreign tax credit (70.7 percent of the \$11.4 billion of total credits), the general business credit (21.2 percent), and the prior-year minimum tax credit (7.1 percent), as well as small amounts of the U.S. possessions tax credit, the nonconventional source fuel credit, and the qualified zone academy bond credit.

Total Receipts—This item includes all of the income actually (as opposed to constructively) received by a corporation and reported on its income

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tax return. It includes gross taxable receipts, before the deduction of cost of goods sold and ordinary and necessary business expenses. It also includes tax-exempt interest received on State and local government obligations. A domestic corporation (i.e., one incorporated in the United States), whether controlled by a foreign person or not, could have business activities in a foreign country, as well as in the United States. Thus, total receipts may include those from foreign branch operations of the U.S. company. Also, the total receipts of a domestic corporation conducting business abroad through foreign subsidiaries may include dividends remitted from those subsidiaries. However, total receipts exclude certain taxable income from related foreign corporations that is only constructively received by the domestic corporation. Long-term capital gains of regulated investment companies, as well as both short-term and long-term capital gains of S corporations, are also excluded.

Total Receipts Less Total Deductions—This item differs from the “net income (less deficit)” shown in the statistics in that it includes nontaxable interest received on State and local government obligations, and excludes constructive taxable income from related foreign corporations.

Data Sources and Limitations

Time Period Covered

Data for Tax Year 2005 are based on returns with accounting periods that ended between July 2005 and June 2006. These accounting periods were 12 months in length, or less for part-year accounting periods. As a result of the 12-month span for ending accounting periods, the statistics shown in this article include accounting periods that began and ended within a 23-month span. For Tax Year 2005, that span was from August 2004 through June 2006. Nevertheless, most of the income and expense data are, in fact, associated with Calendar Year 2005. Of the 61,820 FCDC returns filed for Tax Year 2005, 40,913 had accounting periods that ended in December 2005, 66 percent of the total. These returns accounted for 77 percent of both the receipts and deductions reported by all FCDCs, as well as 87 percent of the FCDC assets.

The sampling frame for the 2005 statistics consisted, in general, of tax returns with accounting

periods that ended between July 2005 and June 2006, and that posted to the IRS Business Master File between July 2005 and June 2007. A 24-month sampling period was needed for several reasons. First, some corporations had noncalendar year accounting periods ending as late as June 2006. Second, while corporation returns were usually required to be filed within 2 1/2 months after the close of the accounting period, many requested filing extensions of 6 months. Third, normal administrative processing time lags required that the sampling process remained open until June 2007.

Returns Covered

The number of returns shown in this article represents returns of “active” corporations, i.e., those that reported any income or deduction items. While any corporation in existence during any portion of the taxable year was required to file an income tax return (even though it may have been inactive, not having any income or deductions), the great majority of returns filed with the Internal Revenue Service were for active corporations. Nonprofit corporations, exempt farmers’ cooperatives, and certain other incorporated organizations did not file corporation income tax returns and are not included in the statistics shown in this article. Part-year returns, those filed for accounting periods of less than 12 months, were included in the number of returns and other data shown in this article. Continuing corporations changing their accounting periods, new corporations in existence less than 12 months, merging corporations, and liquidating corporations filed such returns. To avoid double counting, data from the balance sheets of part-year returns were not included in the statistics, except for those from initial returns of newly incorporated businesses.

Sample

This article presents statistical estimates based on a stratified sample of nearly 7,700 unaudited tax returns selected from over 61,800 returns of active domestic corporations controlled by a foreign person filed for Tax Year 2005. The statistics for FCDCs are based on samples of corporation income tax returns filed primarily on Form 1120 (*U.S. Corporation Income Tax Return*). In addition, the statistics for all FCDCs include data from the small numbers of other domestic corporation income tax returns filed on

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Forms 1120L (*U.S. Life Insurance Company Income Tax Return*), 1120-RIC (*U.S. Income Tax Return for Regulated Investment Companies*), 1120-REIT (*U.S. Income Tax Return for Real Estate Investment Trusts*), and 1120-PC (*U.S. Property and Casualty Insurance Company Income Tax Return*). For Tax Year 2005, FCDCs filed only 52 Forms 1120L, 260 Forms 1120-RIC, 79 Forms 1120-REIT, and 56 Forms 1120-PC.¹⁹ As previously mentioned, FCDCs could not file Forms 1120-A, 1120-F, and 1120S. The statistics for the largest FCDCs shown in Figures F through H, and in Table 4, exclude Forms 1120-RIC and 1120-REIT.

Form 1120 sampled returns were stratified based on the size of total assets and the size of “proceeds” (which was used as a measure of income and was the larger of the absolute value of net income or deficit or the absolute value of “cash flow,” i.e., net income plus depreciation plus depletion). Forms 1120L, 1120-RIC, 1120-REIT, and 1120-PC were sampled based solely on the size of total assets.

For 2005, the sampling rates for Forms 1120 alone (the majority of returns included in the sample) ranged from less than 1 percent to 100 percent. In general, Form 1120 returns with assets of \$50 million or more, or with “proceeds” of \$10 million or more, were selected for the Statistics of Income study at the 100-percent sampling rate. Thus, most if not all of the “largest” FCDCs (and other domestic corporations as well) were selected at the 100-percent rate. Therefore, sampling error is not considered to be a major concern for the large-corporation data shown in this article. For additional information on the sampling rates, see *Statistics of Income—2005, Corporation Income Tax Returns*.

Because the data presented are estimates based on samples, they are subject to sampling error. To properly use these data, the magnitude of the sampling error should be known. Coefficients of variation (CVs) are used to measure that magnitude. Figure I shows CVs for selected financial data of selected industrial sectors and selected countries of the

Figure I

Foreign-Controlled Domestic Corporations: Coefficients of Variation for Selected Items, by Selected Industrial Sector and Selected Country of Foreign Owner, Tax Year 2005

Selected industrial sector or country	Coefficients of variation (percentages)						
	Number of returns	Total assets	Total receipts	Net income	Deficit	Income subject to tax	Total income tax after credits
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Total	4.18	0.03	0.16	0.16	0.64	0.16	0.19
Selected industrial sector:							
Manufacturing	9.66	0.05	0.14	0.15	0.54	0.15	0.19
Wholesale trade	7.97	0.30	0.56	0.53	3.72	0.61	0.63
Information	21.89	0.15	1.10	0.87	0.67	1.11	1.13
Finance and insurance	13.13	0.01	0.15	0.49	0.09	0.30	0.35
Real estate and rental and leasing	8.75	0.95	2.05	2.78	10.87	3.40	3.47
Professional, scientific, and technical services	16.17	0.52	1.71	2.30	3.19	2.90	3.14
Management of companies (holding companies)	23.53	0.06	0.12	0.40	0.23	0.40	0.54
Selected country of foreign owner:							
Bermuda	9.71	0.15	0.82	0.97	1.35	1.74	2.76
Canada	11.65	0.11	0.69	0.69	2.63	0.91	0.99
France	19.60	0.06	0.32	0.39	1.89	0.45	0.54
Germany	13.28	0.07	0.33	0.73	2.01	0.75	1.08
Japan	10.90	0.16	0.44	0.38	1.83	0.39	0.41
Netherlands	23.69	0.04	0.20	0.26	2.06	0.26	0.42
Sweden	52.87	0.43	0.63	1.49	7.15	1.04	1.07
Switzerland	21.13	0.07	0.90	0.60	3.01	0.64	0.68
United Kingdom	14.48	0.03	0.24	0.17	2.59	0.15	0.20

¹⁹ The counts of 52 Forms 1120L and 260 Forms 1120-PC do not include returns of life insurance companies and property/casualty insurance companies, respectively, that were filed as part of consolidated returns under IRC section 1504(c). Under this section, a nonlife insurance parent company could include a domestic life insurance subsidiary in a consolidated return. For 2005, there were 121 section 1504(c) returns of foreign-controlled domestic corporations. Of this number, 59 returns had a property/casualty insurance company as the largest subsidiary; 12 returns had a life insurance company as the largest subsidiary; and the remainder (50) had a noninsurance company as the largest subsidiary.

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foreign owners. For a general discussion of sampling procedures and CVs, see “SOI Sampling Methodology and Data Limitations” located near the back of this issue of the *Statistics of Income Bulletin*.

Nonsampling Limitations

Nonsampling errors can be categorized as coverage errors, nonresponse errors, processing errors, or response errors. These errors can be the result of the inability to obtain information about all returns in the sample, differing interpretations of tax concepts or instructions by the taxpayer, inability of a corporation to provide accurate information at the time of filing (data are collected before auditing), inability to obtain all tax schedules and attachments, errors in recording or coding the data, errors in collecting or cleaning the data, errors made in estimating for missing data, and failure to represent all population units.

Returns were selected for this study based on taxpayers’ responses to two questions that appeared on the various types of Form 1120. The first question asked whether one “foreign person” owned, directly or indirectly, 25 percent or more of the filing corporation’s voting stock or of the total value of all the corporation’s stock, at any time during the tax year. If this question was answered “Yes,” then a second question asked for the percentage owned.²⁰ If the first question was answered “Yes,” and the second question was answered with a percentage between 50 and 100, then the return was included in the FCDC statistics. Taxpayers sometimes incorrectly answered these questions or did not answer them at all.²¹ However, prior to tabulation, corporations with large amounts of assets or receipts, and with changes in foreign ownership status between 2004 and 2005, were researched, and the answers to the questions were verified. These large corporations had a dominating effect on the estimates for balance sheet, income statement, and tax items.

Each return used for the statistics had an industry code reported, or was assigned one during administrative or statistical processing. The North American Industry Classification System (NAICS) was used as a classifier of the returns. The industry code represented the principal business activity (i.e., the activity which accounted for the largest portion of the total receipts) of the corporation filing the return. However, a given return may summarize the activity of a company engaged in several businesses or may have been a consolidated return filed for an affiliated group of corporations that conducted different business activities. To the extent that some consolidated (and nonconsolidated) returns covered corporations that were engaged in many types of business activities, the data in this article are not entirely related to the industrial activity under which they are shown.

There is an additional limitation related to data presented by industrial classification. Companies that sell similar products may not be classified in the same industry. For instance, those FCDCs that were primarily U.S. distributors of products made in foreign countries by their parent or other related companies were classified as wholesalers. However, other domestic corporations that were also distributors may have been included in consolidated returns covering both the manufacture and distribution of similar products and classified as manufacturers.

Each return was assigned a foreign country code during statistical processing that identified the owner’s country. For individuals, it was the owner’s country of residence. For all others, it was the country in which the foreign entity was incorporated, organized, created, or administered. To the extent that a holding company or other affiliated entity was part of a chain between a U.S. subsidiary company and the ultimate foreign parent, the country data may be related to the holding company and, thus, not be related to the foreign country of the ultimate parent.

²⁰ On Form 1120, Page 3, Schedule K, the actual questions were: “(7) At any time during the tax year, did one foreign person own, directly or indirectly, at least 25 percent of: (a) the total voting power of all classes of stock of the corporation entitled to vote, or (b) the total value of all classes of stock of the corporation?” and “(7a) If ‘Yes,’ enter percentage owned.” There was an additional question used for the country distribution of these statistics, which was: “(7b) If ‘Yes,’ enter owner’s country.”

²¹ The FCDC statistics include data from returns in which the first question (see footnote 20) was answered “Yes,” and the second question covering percentage owned was not answered. There were 1,806 returns for Tax Year 2005 that were included in the FCDC data, although the exact foreign ownership percentage was not specified. These returns reported \$21.8 billion of assets and \$18.5 billion of receipts.

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Appendix A

REITs, RICs, and S Corporations Filed by Foreign-Controlled Domestic Corporations (FCDCs) and Other Domestic Corporations (ODCs), Tax Year 2005

[Money amounts are in millions of dollars]

Type of corporation and item	FCDCs	ODCs
Real Estate Investment Trusts		
Number of returns	79	1,172
Total assets	40,780	1,294,294
Total receipts	3,260	110,821
Net income (less deficit)	1,851	68,734
Income subject to tax	0	34
Total income tax after credits	[1]	95
Regulated Investment Companies		
Number of returns	260	10,699
Total assets	189,965	10,290,601
Total receipts	5,438	304,352
Net income (less deficit)	4,189	210,777
Income subject to tax	0	2
Total income tax after credits	[1]	21
S Corporations		
Number of returns	0	3,684,086
Total assets	0	2,736,982
Total receipts	0	5,252,514
Total net income (less deficit)	0	361,043
Income subject to tax	0	1,463
Total income tax after credits	0	611

[1] Less than \$500,000.

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Table 1. Foreign-Controlled Domestic Corporations as a Percentage of All Corporations: Selected Items for Selected Tax Years 1971-2005

[All figures are estimates based on samples—money amounts are in millions of dollars]

Item	1971	1990	1996	2000	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
ALL CORPORATIONS								
Number of returns, total	1,733,332	3,716,650	4,631,370	5,045,274	5,266,607	5,401,237	5,557,965	5,671,257
Number with net income	1,063,940	1,910,670	2,588,424	2,819,153	2,800,517	2,932,115	3,116,468	3,324,260
Total assets	2,889,221	18,190,058	28,642,263	47,026,872	50,413,502	53,644,785	60,117,759	66,445,430
Total receipts	1,906,008	11,409,520	15,525,718	20,605,808	19,749,426	20,689,574	22,711,864	25,504,789
Business receipts	1,763,760	9,860,442	13,659,470	17,636,551	17,297,125	18,264,394	19,975,876	21,800,290
Interest received [1]	65,596	942,238	1,037,374	1,576,101	1,233,298	1,132,675	1,337,626	1,712,271
Total deductions	1,824,063	11,032,575	14,728,089	19,691,592	19,198,882	19,940,595	21,636,156	23,612,766
Cost of goods sold	1,241,282	6,610,770	8,707,100	11,135,288	10,607,404	11,318,645	12,497,905	13,816,464
Interest paid	64,697	825,372	770,885	1,271,679	912,752	818,017	938,790	1,287,098
Total receipts less total deductions	81,945	376,945	797,629	914,216	550,544	748,980	1,075,708	1,892,024
Net income (less deficit)	79,700	370,633	806,485	927,526	563,657	779,989	1,111,693	1,948,655
Net income	96,688	552,527	986,783	1,336,620	1,053,126	1,175,609	1,455,797	2,234,882
Deficit	-16,988	-181,894	-180,298	-409,094	-489,470	-395,620	-344,104	-286,227
Income subject to tax	83,165	366,353	639,840	760,404	600,554	699,337	857,392	1,201,325
Total income tax before credits	37,510	128,186	223,713	266,282	209,691	243,823	299,555	419,209
Income tax	37,143	119,434	219,757	262,233	207,056	241,275	296,200	416,324
Total income tax after credits	30,220	96,403	170,621	204,044	153,613	177,517	224,435	312,086
FOREIGN-CONTROLLED DOMESTIC CORPORATIONS								
Number of returns, total	5,154	44,113	62,141	60,609	61,615	58,945	57,935	61,820
Number with net income	2,575	17,360	29,115	26,519	26,617	27,269	29,233	30,870
Total assets	36,674	1,652,255	3,047,613	6,071,994	6,382,309	6,170,122	7,971,399	9,218,983
Total receipts	39,181	1,060,295	1,656,366	2,612,072	2,510,781	2,569,302	3,056,503	3,505,629
Business receipts	38,043	950,083	1,486,200	2,253,215	2,249,184	2,329,930	2,733,472	3,058,260
Interest received [1]	420	67,315	98,681	180,006	122,104	102,179	154,954	235,304
Total deductions	38,050	1,056,921	1,616,498	2,549,986	2,506,266	2,542,193	2,969,718	3,345,178
Cost of goods sold	28,804	709,052	1,073,946	1,584,513	1,548,698	1,652,622	1,964,224	2,239,966
Interest paid	733	77,562	96,537	186,835	119,001	109,453	129,530	199,877
Total receipts less total deductions	1,132	3,374	39,868	62,085	4,515	27,109	86,785	160,450
Net income (less deficit)	1,111	3,966	41,924	66,312	7,838	31,952	90,846	165,188
Net income	1,496	29,410	67,842	118,598	82,660	92,846	138,010	201,597
Deficit	-384	-25,444	-25,918	-52,287	-74,822	-60,895	-47,165	-36,409
Income subject to tax	1,344	23,704	52,778	97,515	64,593	73,521	104,740	153,007
Total income tax before credits	650	8,719	18,984	34,650	22,727	25,971	37,058	53,820
Income tax	631	8,008	18,329	33,950	22,447	25,607	36,451	53,137
Total income tax after credits	610	7,438	15,437	28,073	17,819	19,121	29,932	42,415
FOREIGN-CONTROLLED DOMESTIC CORPORATIONS AS A PERCENTAGE OF ALL CORPORATIONS								
Number of returns, total	0.30	1.19	1.34	1.20	1.17	1.09	1.04	1.09
Number with net income	0.24	0.91	1.12	0.94	0.95	0.93	0.94	0.93
Total assets	1.27	9.08	10.64	12.91	12.66	11.50	13.26	13.87
Total receipts	2.06	9.29	10.67	12.68	12.71	12.42	13.46	13.74
Business receipts	2.16	9.64	10.88	12.78	13.00	12.76	13.68	14.03
Interest received [1]	0.64	7.14	9.51	11.42	9.90	9.02	11.58	13.74
Total deductions	2.09	9.58	10.98	12.95	13.05	12.75	13.73	14.17
Cost of goods sold	2.32	10.73	12.33	14.23	14.60	14.60	15.72	16.21
Interest paid	1.13	9.40	12.52	14.69	13.04	13.38	13.80	15.53
Total receipts less total deductions	1.38	0.90	5.00	6.79	0.82	3.62	8.07	8.48
Net income (less deficit)	1.39	1.07	5.20	7.15	1.39	4.10	8.17	8.48
Net income	1.55	5.32	6.88	8.87	7.85	7.90	9.48	9.02
Deficit	2.26	13.99	14.38	12.78	15.29	15.39	13.71	12.72
Income subject to tax	1.62	6.47	8.25	12.82	10.76	10.51	12.22	12.74
Total income tax before credits	1.73	6.80	8.49	13.01	10.84	10.65	12.37	12.84
Income tax	1.70	6.70	8.34	12.95	10.84	10.61	12.31	12.76
Total income tax after credits	2.02	7.72	9.05	13.76	11.60	10.77	13.34	13.59

[1] Excludes nontaxable interest received on State and local government obligations.

NOTES: Detail may not add to totals because of rounding. All amounts are in current dollars. Tax law and tax form changes affect the year-to-year comparability of the data. See *Statistics of Income—Corporation Income Tax Returns*, selected years, for discussions of changes affecting the comparability of the data over time.

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Table 2. Foreign-Controlled Domestic Corporations: Selected Items, by Major Industry, Tax Year 2005

[All figures are estimates based on samples—money amounts are in millions of dollars]

Major industry	Number of returns			Total assets	Net worth	Total receipts	Business receipts	Total deductions
	Total	With net income	With total income tax after credits					
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All industries [1]	61,820	30,870	21,362	9,218,983	1,959,727	3,505,629	3,058,260	3,345,178
Agriculture, forestry, fishing, and hunting	841	292	204	5,164	1,776	2,598	2,059	2,649
Agricultural production	664	209	135	4,076	1,761	2,098	1,743	2,175
Forestry and logging	*67	*62	*62	*509	*74	*227	*135	*164
Support activities and fishing, hunting, and trapping	111	*21	*7	579	-59	273	181	310
Mining	696	247	187	100,708	51,032	46,670	43,673	40,992
Utilities	76	48	45	95,959	25,622	40,198	38,329	38,436
Construction	2,530	1,187	1,059	35,480	11,395	41,876	39,233	39,810
Construction of buildings	708	415	382	17,362	5,193	26,983	25,830	25,559
Heavy and civil engineering construction	1,103	174	136	14,083	5,098	9,915	8,536	9,196
Specialty trade contractors	719	598	541	4,035	1,104	4,979	4,867	5,055
Manufacturing	7,128	4,073	2,677	2,380,069	557,013	1,659,400	1,567,026	1,580,675
Food manufacturing	546	142	106	52,460	12,372	51,866	51,139	51,400
Beverage and tobacco product manufacturing	64	37	34	35,050	7,207	24,217	22,455	21,998
Textile mills and textile product mills	136	70	59	3,072	1,348	3,761	3,635	3,688
Apparel manufacturing	104	99	98	1,169	562	2,016	1,971	1,937
Leather and allied product manufacturing	d	d	d	d	d	d	d	d
Wood product manufacturing	174	138	140	5,516	985	7,415	7,250	7,099
Paper manufacturing	111	73	66	14,870	5,231	21,294	20,594	21,385
Printing and related support activities	51	40	40	9,457	1,638	11,315	11,090	11,202
Petroleum and coal products manufacturing	43	38	36	1,015,933	138,750	589,543	569,665	559,379
Chemical manufacturing	477	334	256	280,891	98,655	191,438	174,932	175,536
Plastics and rubber products manufacturing	647	198	162	40,455	8,974	50,034	48,403	49,477
Nonmetallic mineral product manufacturing	149	122	109	81,411	29,541	53,850	50,172	48,937
Primary metal manufacturing	136	89	85	36,019	12,574	45,267	44,022	42,240
Fabricated metal product manufacturing	483	257	180	37,887	12,936	36,742	35,283	34,907
Machinery manufacturing	852	528	406	137,659	43,835	100,962	95,784	98,106
Computer and electronic product manufacturing	1,252	1,047	301	114,528	45,955	95,472	90,586	95,173
Electrical equipment, appliance, and component manufacturing	273	166	76	35,897	14,377	29,986	28,672	28,758
Transportation equipment manufacturing	873	282	238	440,651	111,754	310,846	280,369	297,855
Furniture and related product manufacturing	140	*112	*11	1,712	393	3,236	3,199	3,029
Miscellaneous manufacturing	d	d	d	d	d	d	d	d
Wholesale and retail trade	19,388	9,762	6,667	526,079	144,100	888,086	860,612	862,002
Wholesale trade	15,789	8,318	5,800	431,167	116,701	713,321	690,450	691,128
Wholesale trade, durable goods	10,302	5,631	4,267	291,103	77,799	510,279	498,449	498,038
Wholesale trade, nondurable goods	5,110	2,591	1,530	139,862	38,782	202,836	191,795	192,886
Wholesale electronic markets and agents and brokers	*377	*96	*4	*201	*120	*206	*206	*205
Retail trade	3,599	1,444	866	94,913	27,399	174,765	170,163	170,873
Motor vehicle dealers and parts dealers	90	40	21	3,456	1,080	7,462	7,300	7,358
Furniture and home furnishings stores	163	d	d	4,825	700	5,009	4,924	4,891
Electronics and appliance stores	481	241	90	2,040	-267	3,794	3,699	3,782
Building material and garden equipment and supplies dealers	*58	*55	*54	*597	*181	*1,294	*1,274	*1,272
Food, beverage and liquor stores	43	17	16	42,803	13,231	95,378	93,338	93,381
Health and personal care stores	93	*33	*31	9,179	1,829	14,876	14,479	14,584
Gasoline stations	*312	*63	*62	*2,323	*783	*9,106	*8,973	*8,912
Clothing and clothing accessories stores	288	85	69	13,021	6,955	12,669	11,878	11,914
Sporting goods, hobby, book, and music stores	693	*93	*92	905	176	1,560	1,532	1,596
General merchandise stores	*232	d	d	*123	*61	*307	*277	*340
Miscellaneous store retailers	137	68	58	8,114	247	8,284	7,939	8,160
Nonstore retailers	1,009	723	322	7,529	2,422	15,028	14,549	14,683
Transportation and warehousing	2,510	1,604	1,203	50,735	19,762	47,882	45,689	47,923
Air, rail, and water transportation	413	111	32	15,320	5,018	8,088	7,524	7,859
Truck transportation	555	*26	*25	1,415	535	1,994	1,962	1,989
Transit and ground passenger transportation	*280	*277	*277	*2,803	*1,611	*2,530	*2,487	*2,558
Pipeline transportation	*14	*11	*11	*3,411	*1,893	*1,244	*1,047	*1,248
Other transportation and support activities	942	877	569	24,090	9,438	31,243	30,171	31,738
Warehousing and storage	307	303	290	3,696	1,268	2,783	2,498	2,532

Footnotes at end of table.

Foreign-Controlled Domestic Corporations, 2005

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Table 2. Foreign-Controlled Domestic Corporations: Selected Items, by Major Industry, Tax Year 2005—Continued

[All figures are estimates based on samples—money amounts are in millions of dollars]

Major industry	Number of returns			Total assets	Net worth	Total receipts	Business receipts	Total deductions
	Total	With net income	With total income tax after credits					
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Information	2,256	1,015	657	309,461	181,578	82,855	71,028	80,216
Publishing industries	941	510	163	61,960	15,408	29,719	25,709	28,945
Motion picture and sound recording industries	422	30	26	28,175	13,226	10,942	8,205	9,887
Broadcasting (except Internet)	92	*18	*17	2,697	1,835	1,296	1,189	1,440
Internet publishing and broadcasting	*5	d	d	*15,327	*3,318	*7,920	*7,624	*7,284
Telecommunications	570	306	303	185,804	143,558	26,348	22,641	26,268
Internet service providers, Web search portals, and data processing services	183	128	*124	3,943	201	1,365	1,209	1,487
Other information services	42	d	d	11,555	4,033	5,266	4,450	4,905
Finance and insurance	2,540	1,390	962	4,370,039	729,450	436,398	222,230	415,581
Credit intermediation	668	216	163	261,113	21,106	16,864	8,076	15,990
Depository credit intermediation	149	32	30	94,110	7,083	4,074	595	3,529
Nondepository credit intermediation	519	184	133	167,003	14,023	12,790	7,481	12,461
Securities, commodity contracts, and other financial investments and related activities	757	450	389	2,014,317	90,288	139,628	32,202	132,869
Insurance carriers and related activities	340	257	236	1,821,551	402,627	269,256	181,950	262,557
Funds, trusts, and other financial vehicles	776	467	174	273,057	215,429	10,650	3	4,166
Real estate and rental and leasing	11,571	5,487	3,835	106,071	35,998	25,235	16,869	22,144
Real estate	11,274	5,246	3,652	74,648	30,593	13,060	6,383	10,602
Rental and leasing services	292	d	d	31,192	5,308	12,022	10,396	11,401
Lessors of nonfinancial intangible assets (except copyrighted works)	*5	d	d	*232	*97	*152	*89	*141
Professional, scientific, and technical services	5,442	2,470	1,435	117,966	51,311	64,546	59,558	62,822
Management of companies (holding companies)	2,567	1,058	726	1,002,966	105,938	85,278	16,660	71,082
Administrative and support and waste management and remediation services	1,368	648	276	34,494	11,430	33,765	32,021	33,382
Administrative and support services	1,348	636	266	28,752	9,201	30,447	28,909	30,022
Waste management and remediation services	*20	*12	*10	*5,742	*2,229	*3,319	*3,112	*3,360
Educational services	108	*13	*12	1,369	575	1,180	1,143	1,143
Health care and social assistance	369	265	265	22,781	11,653	13,448	12,510	12,090
Offices of health practitioners and outpatient care centers	*309	*251	*251	*17,284	*9,636	*8,686	*7,977	*7,528
Miscellaneous health care and social assistance	22	*10	*10	2,079	874	1,424	1,345	1,420
Hospitals, nursing, and residential care facilities	*38	*4	*4	*3,419	*1,143	*3,338	*3,188	*3,142
Arts, entertainment, and recreation	737	630	594	5,874	1,620	4,171	3,382	3,992
Amusement, gambling, and recreation industries	408	366	334	3,064	1,060	1,635	1,308	1,461
Other arts, entertainment, and recreation	329	265	261	2,810	560	2,536	2,074	2,532
Accommodation and food services	1,110	487	364	49,719	18,400	28,097	22,496	26,480
Accommodation	365	184	152	35,341	16,968	9,612	5,616	8,497
Food services and drinking places	745	303	212	14,378	1,433	18,485	16,880	17,984
Other services	583	193	193	4,045	1,073	3,947	3,746	3,748
Repair and maintenance	d	d	d	d	d	d	d	d
Personal and laundry services	387	*8	*8	2,291	352	1,501	1,350	1,375
Religious, grantmaking, civic, professional, and similar organizations	d	d	d	d	d	d	d	d

Footnotes at end of table.

Foreign-Controlled Domestic Corporations, 2005

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Table 2. Foreign-Controlled Domestic Corporations: Selected Items, by Major Industry, Tax Year 2005—Continued

[All figures are estimates based on samples—money amounts are in millions of dollars]

Major industry	Cost of goods sold	Total receipts less total deductions	Net income (less deficit)	Net income	Deficit	Income subject to tax	Total income tax	
							Before credits	After credits
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All industries [1]	2,239,966	160,450	165,188	201,597	-36,409	153,007	53,820	42,415
Agriculture, forestry, fishing, and hunting	1,270	-51	-46	296	-342	142	50	47
Agricultural production	1,058	-77	-77	184	-261	67	23	21
Forestry and logging	*112	*62	*62	*64	*-1	*64	*22	*22
Support activities and fishing, hunting, and trapping	101	-37	-32	*48	*-80	*11	*4	*3
Mining	23,628	5,678	6,017	6,831	-814	4,147	1,665	863
Utilities	22,873	1,761	1,758	1,884	-126	723	271	185
Construction	32,997	2,066	2,064	2,680	-616	2,310	808	796
Construction of buildings	22,809	1,423	1,422	1,512	-90	1,425	499	497
Heavy and civil engineering construction	6,758	719	719	958	-239	712	249	239
Specialty trade contractors	3,429	-76	-77	210	-287	173	60	60
Manufacturing	1,226,727	78,725	81,684	93,273	-11,589	78,253	27,486	19,838
Food manufacturing	31,988	465	445	1,826	-1,381	1,648	580	567
Beverage and tobacco product manufacturing	11,227	2,220	2,239	2,274	-35	1,936	677	640
Textile mills and textile product mills	2,731	73	73	182	-109	137	48	47
Apparel manufacturing	1,352	78	78	112	-34	91	31	31
Leather and allied product manufacturing	d	d	d	d	d	d	d	d
Wood product manufacturing	5,765	316	316	406	-90	357	125	124
Paper manufacturing	17,017	-90	-89	398	-487	126	44	40
Printing and related support activities	7,889	113	113	178	-65	133	47	43
Petroleum and coal products manufacturing	516,744	30,163	31,147	31,183	-36	30,653	10,728	6,896
Chemical manufacturing	94,674	15,902	17,036	18,030	-994	15,669	5,503	4,007
Plastics and rubber products manufacturing	35,709	557	595	1,131	-537	605	212	174
Nonmetallic mineral product manufacturing	32,521	4,914	5,026	5,269	-242	3,697	1,322	1,209
Primary metal manufacturing	34,779	3,027	3,117	3,446	-328	3,052	1,070	612
Fabricated metal product manufacturing	25,812	1,834	1,870	2,213	-343	1,649	580	542
Machinery manufacturing	70,846	2,856	2,929	4,102	-1,174	2,245	797	598
Computer and electronic product manufacturing	69,127	299	396	2,496	-2,100	1,454	520	431
Electrical equipment, appliance, and component manufacturing	20,580	1,227	1,378	1,790	-412	1,069	380	208
Transportation equipment manufacturing	227,496	12,991	13,210	15,743	-2,533	12,216	4,279	3,172
Furniture and related product manufacturing	2,280	207	207	*207	*[2]	*197	*69	*67
Miscellaneous manufacturing	d	d	d	d	d	d	d	d
Wholesale and retail trade	691,591	26,085	26,504	31,482	-4,978	24,002	8,380	7,799
Wholesale trade	567,145	22,193	22,453	26,500	-4,047	20,581	7,175	6,647
Wholesale trade, durable goods	415,607	12,242	12,391	15,192	-2,800	11,417	3,977	3,684
Wholesale trade, nondurable goods	151,538	9,950	10,061	11,299	-1,238	9,163	3,198	2,963
Wholesale electronic markets and agents and brokers	*0	*1	*1	*9	*-8	*[2]	*[2]	*[2]
Retail trade	124,446	3,892	4,051	4,981	-931	3,421	1,205	1,151
Motor vehicle dealers and parts dealers	6,325	104	104	150	-46	136	48	47
Furniture and home furnishings stores	2,792	118	117	d	d	d	d	d
Electronics and appliance stores	2,664	11	11	174	-163	58	21	17
Building material and garden equipment and supplies dealers	*1,055	*22	*22	*34	*-12	*27	*9	*8
Food, beverage and liquor stores	70,419	1,997	2,172	2,211	-38	1,342	471	450
Health and personal care stores	9,240	292	295	*447	*-152	*379	*133	*123
Gasoline stations	*7,620	*194	*189	*189	*[2]	*183	*64	*59
Clothing and clothing accessories stores	5,711	754	754	898	-144	566	203	202
Sporting goods, hobby, book, and music stores	1,142	-36	-36	*36	*-72	*18	*5	*4
General merchandise stores	*208	*-33	*-34	d	d	d	d	d
Miscellaneous store retailers	5,449	124	125	182	-57	119	42	40
Nonstore retailers	11,822	345	330	459	-130	395	140	134
Transportation and warehousing	17,392	-42	-33	1,607	-1,640	1,219	423	365
Air, rail, and water transportation	2,352	229	237	426	-189	385	136	92
Truck transportation	153	5	5	*31	*-26	*21	*8	*6
Transit and ground passenger transportation	*1,097	*-28	*-28	*9	*-37	*4	*1	*1
Pipeline transportation	*845	*-4	*-17	*81	*-98	*79	*27	*27
Other transportation and support activities	12,379	-495	-481	788	-1,269	561	193	182
Warehousing and storage	567	250	252	273	-21	168	59	57

Footnotes at end of table.

Foreign-Controlled Domestic Corporations, 2005

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Table 2. Foreign-Controlled Domestic Corporations: Selected Items, by Major Industry, Tax Year 2005—Continued

[All figures are estimates based on samples—money amounts are in millions of dollars]

Major industry	Cost of goods sold	Total receipts less total deductions	Net income (less deficit)	Net income	Deficit	Income subject to tax	Total income tax	
							Before credits	After credits
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
Information	27,059	2,639	2,917	6,709	-3,792	3,379	1,214	1,090
Publishing industries	10,743	774	855	1,283	-428	722	255	199
Motion picture and sound recording industries	4,035	1,055	1,175	1,277	-102	48	20	13
Broadcasting (except Internet)	478	-145	-154	*52	*-206	*27	*9	*8
Internet publishing and broadcasting	*1,616	*636	*637	d	d	d	d	d
Telecommunications	9,249	80	145	2,938	-2,793	1,809	655	608
Internet service providers, Web search portals, and data processing services	455	-122	-122	52	-174	*40	*13	*13
Other information services	484	361	382	d	d	d	d	d
Finance and insurance	137,081	20,816	21,155	28,280	-7,125	15,787	5,431	4,430
Credit intermediation	117	874	872	1,640	-768	1,517	530	491
Depository credit intermediation	0	545	541	601	-60	598	209	207
Nondepository credit intermediation	117	329	331	1,039	-708	919	321	284
Securities, commodity contracts, and other financial investments and related activities	507	6,758	7,218	7,978	-760	5,417	1,946	1,532
Insurance carriers and related activities	136,457	6,699	6,592	11,854	-5,262	8,219	2,734	2,299
Funds, trusts, and other financial vehicles	0	6,484	6,473	6,808	-335	633	221	107
Real estate and rental and leasing	4,651	3,091	2,870	4,347	-1,477	2,811	978	914
Real estate	689	2,459	2,444	3,393	-949	2,427	835	811
Rental and leasing services	3,915	621	415	d	d	d	d	d
Lessors of nonfinancial intangible assets (except copyrighted works)	*47	*11	*11	d	d	d	d	d
Professional, scientific, and technical services	21,419	1,724	1,761	3,713	-1,951	2,248	790	689
Management of companies (holding companies)	759	14,196	14,734	15,586	-852	14,268	5,003	4,230
Administrative and support and waste management and remediation services	15,374	384	388	807	-419	544	190	169
Administrative and support services	14,985	425	428	784	-356	525	183	162
Waste management and remediation services	*388	*-41	*-40	*23	*-63	*19	*7	*7
Educational services	430	38	39	*58	*-19	*37	*13	*9
Health care and social assistance	4,535	1,358	1,357	1,485	-128	1,262	445	427
Offices of health practitioners and outpatient care centers	*4,040	*1,159	*1,158	*1,186	*-27	*1,115	*390	*385
Miscellaneous health care and social assistance	463	4	3	*54	*-51	*51	*18	*17
Hospitals, nursing, and residential care facilities	*32	*195	*195	*246	*-50	*96	*36	*24
Arts, entertainment, and recreation	788	178	185	405	-221	367	127	114
Amusement, gambling, and recreation industries	272	174	180	244	-64	219	76	66
Other arts, entertainment, and recreation	516	4	5	161	-157	148	51	48
Accommodation and food services	9,518	1,616	1,629	1,872	-243	1,249	458	380
Accommodation	845	1,115	1,126	1,236	-110	700	265	222
Food services and drinking places	8,673	501	503	636	-133	550	193	159
Other services	1,874	199	217	282	-65	259	89	70
Repair and maintenance	d	d	d	d	d	d	d	d
Personal and laundry services	304	127	144	*192	*-48	*187	*65	*46
Religious, grantmaking, civic, professional, and similar organizations	d	d	d	d	d	d	d	d

* Estimate should be used with caution because of the small number of sample returns on which it is based.

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

[1] Includes "Not allocable," which is not shown separately.

[2] Absolute value is less than \$500,000.

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

Foreign-Controlled Domestic Corporations, 2005

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Table 3. Foreign-Controlled Domestic Corporations: Selected Items, by Age of Corporation and Selected Country of Foreign Owner, Tax Year 2005

[All figures are estimates based on samples—money amounts are in millions of dollars]

Age of corporation and selected country of foreign owner	Number of returns			Total assets	Net worth	Total receipts	Business receipts	Total deductions
	Total	With net income	With total income tax after credits					
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All foreign-controlled domestic corporations	61,820	30,870	21,362	9,218,983	1,959,727	3,505,629	3,058,260	3,345,178
AGE OF CORPORATION								
Old corporations:								
Number or amount	48,272	25,993	18,067	8,844,437	1,846,471	3,332,478	2,900,335	3,176,551
Percentage of all corporations	78.08	84.20	84.58	95.94	94.22	95.06	94.84	94.96
New corporations:								
Number or amount	13,548	4,878	3,294	374,546	113,257	173,151	157,926	168,627
Percentage of all corporations	21.92	15.80	15.42	4.06	5.78	4.94	5.16	5.04
SELECTED COUNTRY OF FOREIGN OWNER								
Selected countries, total	55,313	27,843	19,130	9,176,324	1,949,373	3,469,236	3,024,638	3,310,030
Percentage of all countries	89.47	90.19	89.55	99.54	99.47	98.96	98.90	98.95
Selected countries:								
Australia	1,189	716	335	98,335	27,333	32,972	29,155	30,085
Austria	294	239	206	6,793	2,706	9,272	9,034	8,747
Belgium	659	495	155	81,653	8,959	38,769	32,960	36,575
Bermuda	248	143	108	200,316	62,840	65,581	54,478	64,977
Brazil	1,092	444	67	9,345	1,890	7,885	7,359	7,600
British Virgin Islands [1]	3,203	1,176	922	20,296	5,911	18,054	16,056	17,587
Canada	9,569	4,796	3,691	889,973	261,760	303,710	257,202	292,448
Cayman Islands	1,190	459	430	88,953	41,510	23,910	19,779	22,207
China	1,280	433	381	4,962	1,320	8,486	8,295	8,263
China (Taiwan)	1,524	464	333	14,777	4,763	22,878	22,304	22,202
Colombia	886	*63	*62	621	-29	542	488	553
Denmark	441	381	84	18,147	4,072	19,943	18,951	19,233
Finland	84	44	44	12,694	4,779	21,209	20,218	20,855
Former Soviet Union [2]	628	*352	*76	2,097	577	8,087	7,945	8,038
France	2,213	1,112	514	850,778	241,097	228,913	183,685	213,664
Germany	4,252	2,221	1,597	1,165,695	245,699	444,701	376,542	428,537
Hong Kong	1,318	650	483	7,053	1,913	8,929	8,418	8,783
India	1,191	840	742	3,482	735	5,929	5,863	5,890
Ireland	496	186	161	29,020	3,306	17,494	15,559	17,004
Israel	918	469	305	35,464	7,078	13,971	12,257	13,274
Italy	1,318	637	425	30,042	9,847	22,005	20,667	20,668
Japan	4,853	2,590	1,976	686,403	174,559	567,063	532,471	543,963
Liechtenstein	180	63	44	2,754	1,281	5,093	4,804	4,831
Luxembourg	363	184	120	41,125	13,657	24,932	23,102	24,342
Mexico	2,192	1,397	891	24,204	11,311	21,302	19,400	19,388
Netherlands	1,885	1,067	795	1,400,655	290,685	431,047	366,254	412,554
Netherlands Antilles	268	142	132	9,062	3,631	7,702	6,990	6,699
Norway	208	70	53	13,709	4,942	13,246	12,412	12,647
Pakistan	*506	d	d	*82	*37	*221	*220	*244
Panama	1,037	723	214	10,142	1,211	5,946	5,455	5,664
Puerto Rico	98	*19	*7	26,927	1,332	1,884	291	1,826
Saudi Arabia	286	30	*12	4,217	1,969	9,719	8,618	8,876
Singapore	188	95	72	14,119	5,813	8,855	8,335	8,789
South Africa, Republic of	317	d	d	3,759	467	5,684	5,599	5,798
South Korea, Republic of	1,333	563	279	25,143	4,717	59,007	57,846	58,508
Spain	417	213	115	16,140	5,116	11,624	10,903	11,439
Sweden	466	362	343	49,528	12,274	52,528	49,467	50,619
Switzerland	1,427	779	634	771,797	56,155	156,562	123,717	149,123
United Kingdom	4,281	2,476	1,593	2,484,273	417,785	719,154	618,397	674,707
Venezuela	1,015	738	717	21,789	4,365	44,427	43,142	42,823

Footnotes at end of table.

Foreign-Controlled Domestic Corporations, 2005

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Table 3. Foreign-Controlled Domestic Corporations: Selected Items, by Age of Corporation and Selected Country of Foreign Owner, Tax Year 2005—Continued

[All figures are estimates based on samples—money amounts are in millions of dollars]

Age of corporation and selected country of foreign owner	Cost of goods sold	Total receipts less total deductions	Net income (less deficit)	Net income	Deficit	Income subject to tax	Total income tax	
							Before credits	After credits
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All foreign-controlled domestic corporations	2,239,966	160,450	165,188	201,597	-36,409	153,007	53,820	42,415
AGE OF CORPORATION								
Old corporations:								
Number or amount	2,125,263	155,926	160,244	192,140	-31,896	146,133	51,371	40,444
Percentage of all corporations	94.88	97.18	97.01	95.31	87.60	95.51	95.45	95.35
New corporations:								
Number or amount	114,703	4,524	4,944	9,456	-4,513	6,874	2,449	1,971
Percentage of all corporations	5.12	2.82	2.99	4.69	12.40	4.49	4.55	4.65
SELECTED COUNTRY OF FOREIGN OWNER								
Selected countries, total	2,214,543	159,206	163,928	199,159	-35,225	151,165	53,177	41,864
Percentage of all countries	98.87	99.22	99.24	98.79	96.75	98.80	98.81	98.70
Selected countries:								
Australia	17,570	2,888	2,973	3,998	-1,025	2,998	1,064	554
Austria	6,584	525	524	579	-55	533	186	181
Belgium	23,925	2,193	2,216	2,427	-211	1,841	646	593
Bermuda	36,213	604	803	3,661	-2,858	1,522	571	318
Brazil	5,507	285	284	515	-231	477	166	165
British Virgin Islands [1]	12,129	468	473	1,155	-682	579	199	194
Canada	188,912	11,261	11,420	17,310	-5,890	11,243	4,002	3,365
Cayman Islands	9,993	1,703	1,792	2,867	-1,075	1,251	443	340
China	6,652	224	223	296	-73	264	90	78
China (Taiwan)	19,707	676	676	901	-224	674	235	192
Colombia	397	-11	-11	*24	*-35	*24	*7	*4
Denmark	12,968	710	725	901	-176	435	177	152
Finland	15,716	354	362	487	-125	217	82	65
Former Soviet Union [2]	7,493	49	49	*109	*-59	*86	*30	*30
France	122,504	15,249	15,873	18,820	-2,946	12,824	4,360	3,534
Germany	260,878	16,164	16,772	20,895	-4,122	11,133	3,945	2,592
Hong Kong	7,148	146	146	291	-145	211	72	66
India	3,019	39	38	182	-144	154	49	48
Ireland	10,880	490	486	786	-300	607	212	208
Israel	9,282	697	709	1,071	-361	771	269	250
Italy	12,285	1,337	1,359	1,732	-373	1,427	497	404
Japan	412,190	23,099	23,122	27,815	-4,693	23,951	8,398	7,791
Liechtenstein	3,764	261	259	290	-31	157	54	53
Luxembourg	12,855	590	663	1,334	-671	1,095	389	318
Mexico	13,022	1,914	2,001	2,431	-430	1,762	614	187
Netherlands	290,792	18,493	18,952	20,785	-1,832	16,687	5,814	4,592
Netherlands Antilles	2,979	1,003	1,001	1,089	-88	849	297	279
Norway	10,166	600	602	784	-182	307	107	101
Pakistan	*153	*-22	*-22	d	d	d	d	d
Panama	4,473	283	289	370	-81	237	82	82
Puerto Rico	26	58	56	*79	*-23	*78	*27	*26
Saudi Arabia	8,316	843	843	889	-46	885	*310	*275
Singapore	5,198	66	70	208	-138	98	35	32
South Africa, Republic of	4,392	-114	-114	d	d	d	d	d
South Korea, Republic of	52,949	498	504	936	-432	576	201	188
Spain	8,100	185	238	645	-407	545	191	164
Sweden	38,224	1,909	1,892	2,167	-276	1,618	565	498
Switzerland	61,902	7,438	7,386	8,800	-1,413	7,180	2,524	2,289
United Kingdom	454,184	44,447	46,688	49,731	-3,043	44,133	15,663	11,057
Venezuela	41,096	1,604	1,606	1,693	-87	1,645	572	567

* Estimate should be used with caution because of the small number of sample returns on which it is based.

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

[1] Includes domestic corporations with owners from Saint Christopher, Nevis, and Anguilla.

[2] Includes domestic corporations with owners from Russia, Armenia, Uzbekistan, Ukraine, Turkmenistan, Tajikistan, Sakhalin Island, Moldova, Kyrgyzstan, Azerbaijan, Kazakhstan, Kurile Islands, Georgia, Belarus, and Estonia.

NOTES: "New" corporations were those with dates of incorporation between 2003 and 2006; "old" corporations were those with dates of incorporation prior to 2003, or with unknown dates of incorporation. Countries shown in this table are those in which one or more of the following were present: (a) at least 500 returns, (b) at least \$10 billion of total assets, or (c) at least \$5 billion of total receipts. Detail may not add to totals because of rounding.

Foreign-Controlled Domestic Corporations, 2005

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Table 4. "Large" Foreign-Controlled Domestic Corporations Compared to Other "Large" Domestic Corporations: Selected Items and Percentages, by Industrial Sector, Tax Year 2005

[Money amounts are in millions of dollars]

Control status and industrial sector	Number of returns			Assets			
	Total	With net income	With total income tax after credits	Total	Current	Noncurrent	
						Total	Loans to stockholders
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
FOREIGN-CONTROLLED DOMESTIC CORPORATIONS							
All industries	3,790	2,853	2,723	8,767,910	4,097,858	4,670,051	30,229
Agriculture, forestry, fishing, and hunting	12	9	8	1,675	483	1,192	0
Mining	78	55	52	94,614	21,512	73,102	409
Utilities	25	22	18	93,942	11,546	82,396	0
Construction	78	53	52	28,464	17,004	11,459	118
Manufacturing	1,418	1,028	976	2,341,323	1,309,016	1,032,307	2,829
Wholesale and retail trade	1,191	973	940	483,067	274,422	208,646	2,044
Wholesale trade	1,063	878	850	394,464	241,119	153,345	1,562
Retail trade	128	96	91	88,603	33,302	55,301	482
Transportation and warehousing	77	59	55	46,153	10,172	35,981	266
Information	109	71	65	301,387	37,819	263,568	2,146
Finance and insurance	306	234	229	4,116,485	1,729,392	2,387,093	21,277
Real estate and rental and leasing	67	46	46	63,038	17,850	45,188	209
Professional, scientific, and technical services	180	132	122	105,900	32,195	73,706	16
Management of companies (holding companies)	83	62	56	985,394	617,637	367,757	380
Administrative and support and waste management and remediation services	71	52	49	31,554	7,023	24,531	68
Educational services	6	d	d	1,143	309	833	0
Health care and social assistance	20	13	13	22,101	5,041	17,060	38
Arts, entertainment, and recreation	19	7	7	4,138	1,045	3,093	0
Accommodation and food services	39	26	26	44,865	4,633	40,232	421
Other services	12	d	d	2,667	759	1,908	7
DOMESTIC CORPORATIONS NOT FOREIGN-CONTROLLED							
All industries	15,248	11,944	11,535	41,072,862	16,138,040	24,934,822	338,405
Agriculture, forestry, fishing, and hunting	111	89	84	20,839	6,794	14,045	96
Mining	229	172	171	393,902	89,621	304,282	2,211
Utilities	186	130	124	1,378,146	322,912	1,055,234	91
Construction	768	663	671	181,437	112,637	68,800	1,336
Manufacturing	3,293	2,453	2,316	7,418,404	2,583,239	4,835,166	37,790
Wholesale and retail trade	3,959	3,249	3,147	1,769,855	728,891	1,040,964	2,042
Wholesale trade	2,218	1,892	1,846	889,312	364,083	525,229	1,553
Retail trade	1,741	1,358	1,301	880,543	364,808	515,735	489
Transportation and warehousing	478	348	337	434,486	96,272	338,213	1,761
Information	683	405	385	2,487,723	492,740	1,994,984	719
Finance and insurance	2,013	1,702	1,670	13,897,302	4,762,360	9,134,942	4,735
Real estate and rental and leasing	168	118	111	215,972	81,699	134,273	183
Professional, scientific, and technical services	789	549	515	326,654	138,631	188,023	482
Management of companies (holding companies)	1,300	1,242	1,240	11,886,758	6,575,929	5,310,828	285,368
Administrative and support and waste management and remediation services	321	227	220	175,982	42,049	133,933	129
Educational services	52	33	31	15,260	5,335	9,926	6
Health care and social assistance	495	284	248	153,355	36,966	116,389	74
Arts, entertainment, and recreation	63	37	35	44,649	6,783	37,866	1,198
Accommodation and food services	262	187	176	242,324	47,852	194,472	151
Other services	80	57	53	29,812	7,329	22,483	34

Footnotes at end of table.

Foreign-Controlled Domestic Corporations, 2005

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Table 4. "Large" Foreign-Controlled Domestic Corporations Compared to Other "Large" Domestic Corporations: Selected Items and Percentages, by Industrial Sector, Tax Year 2005—Continued

[Money amounts are in millions of dollars]

Control status and industrial sector	Liabilities			Net worth			
	Current	Noncurrent		Total	Retained earnings		
		Total	Loans from stockholders		Total	Appropriated	Unappropriated
	(8)	(9)	(10)	(11)	(12)	(13)	(14)
FOREIGN-CONTROLLED DOMESTIC CORPORATIONS							
All industries	4,197,448	2,878,442	118,991	1,692,020	-23,510	16,671	-40,181
Agriculture, forestry, fishing, and hunting	231	678	0	766	-132	0	-132
Mining	15,061	29,909	2,277	49,644	-1,169	4	-1,172
Utilities	13,782	55,208	2,088	24,952	306	0	306
Construction	11,399	7,472	793	9,593	361	0	361
Manufacturing	1,166,792	628,046	63,546	546,485	-22,970	635	-23,606
Wholesale and retail trade	209,510	138,418	6,202	135,139	8,278	80	8,198
Wholesale trade	181,154	104,357	4,374	108,954	8,163	8	8,155
Retail trade	28,357	34,061	1,828	26,185	115	72	43
Transportation and warehousing	9,946	17,862	555	18,345	-2,337	5	-2,342
Information	43,426	76,368	24,184	181,594	-40,706	305	-41,011
Finance and insurance	1,891,023	1,704,642	10,659	520,820	39,490	15,519	23,971
Real estate and rental and leasing	14,432	29,258	1,420	19,348	-416	0	-416
Professional, scientific, and technical services	34,651	23,444	2,491	47,805	-15,540	23	-15,563
Management of companies (holding companies)	768,367	121,815	2,115	95,212	26,820	93	26,727
Administrative and support and waste management and remediation services	7,143	13,161	1,646	11,249	-15,335	0	-15,335
Educational services	395	265	103	483	-226	0	-226
Health care and social assistance	3,137	7,573	483	11,390	1,279	0	1,279
Arts, entertainment, and recreation	1,421	1,455	114	1,262	-58	0	-58
Accommodation and food services	6,014	21,504	254	17,347	-1,599	0	-1,599
Other services	718	1,363	61	586	443	6	437
DOMESTIC CORPORATIONS NOT FOREIGN-CONTROLLED							
All industries	19,851,960	11,532,423	102,662	9,688,480	3,435,032	115,989	3,319,042
Agriculture, forestry, fishing, and hunting	5,630	11,373	502	3,836	1,402	18	1,384
Mining	67,365	148,032	639	178,505	59,583	54	59,529
Utilities	330,893	719,109	1,259	328,143	3,081	1,178	1,903
Construction	55,432	62,494	285	63,511	45,757	6	45,751
Manufacturing	2,235,072	2,188,938	27,038	2,994,395	1,284,794	2,641	1,282,154
Wholesale and retail trade	553,265	410,787	4,006	805,804	498,980	2,673	496,307
Wholesale trade	258,981	179,190	2,734	451,141	272,872	2,464	270,408
Retail trade	294,284	231,596	1,272	354,662	226,108	209	225,899
Transportation and warehousing	99,721	255,028	2,440	79,737	11,053	46	11,007
Information	493,116	885,516	2,807	1,109,092	-141,309	171	-141,480
Finance and insurance	7,012,418	4,782,084	2,999	2,102,800	1,111,492	106,887	1,004,605
Real estate and rental and leasing	62,198	98,832	3,187	54,943	5,572	19	5,553
Professional, scientific, and technical services	117,491	85,347	863	123,816	-26,012	168	-26,180
Management of companies (holding companies)	8,690,573	1,579,878	51,971	1,616,308	522,282	1,806	520,476
Administrative and support and waste management and remediation services	39,342	74,516	66	62,124	17,002	127	16,875
Educational services	4,198	4,105	20	6,958	2,554	0	2,554
Health care and social assistance	32,096	70,001	898	51,259	1,592	12	1,580
Arts, entertainment, and recreation	7,104	20,520	1,789	17,025	-8,288	6	-8,294
Accommodation and food services	41,157	122,002	1,875	79,166	44,337	122	44,215
Other services	4,891	13,862	19	11,059	1,160	57	1,104

Footnotes at end of table.

Foreign-Controlled Domestic Corporations, 2005

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Table 4. "Large" Foreign-Controlled Domestic Corporations Compared to Other "Large" Domestic Corporations: Selected Items and Percentages, by Industrial Sector, Tax Year 2005—Continued

[Money amounts are in millions of dollars]

Control status and industrial sector	Receipts						Dividends received from:	
	Total	Business receipts	Interest [1]	Rents	Royalties		Domestic corporations	Foreign corporations
	(15)	(16)	(17)	(18)	(19)		(20)	(21)
FOREIGN-CONTROLLED DOMESTIC CORPORATIONS								
All industries	3,317,476	2,896,114	230,843	15,680	11,086		4,232	17,531
Agriculture, forestry, fishing, and hunting	1,140	1,037	9	1	1		0	0
Mining	44,712	42,140	529	61	48		628	147
Utilities	39,742	37,935	754	206	0		34	40
Construction	37,734	35,895	309	175	11		1	42
Manufacturing	1,613,934	1,523,244	21,211	9,691	4,656		524	10,405
Wholesale and retail trade	814,069	788,353	5,549	1,195	2,181		550	2,362
Wholesale trade	647,165	625,655	4,814	821	1,923		525	1,540
Retail trade	166,904	162,699	735	374	257		25	822
Transportation and warehousing	40,411	38,546	400	233	19		4	135
Information	75,587	64,296	2,529	111	2,789		564	429
Finance and insurance	421,980	218,793	141,464	1,580	24		1,769	2,823
Real estate and rental and leasing	16,678	12,806	899	317	4		22	19
Professional, scientific, and technical services	53,056	49,634	554	101	679		28	134
Management of companies (holding companies)	83,443	16,635	55,573	1,832	111		78	895
Administrative and support and waste management and remediation services	30,049	28,587	350	7	6		8	8
Educational services	873	845	2	1	24		0	1
Health care and social assistance	12,994	12,100	108	9	14		0	14
Arts, entertainment, and recreation	2,950	2,250	63	29	25		20	1
Accommodation and food services	25,446	20,482	511	131	449		3	46
Other services	2,678	2,538	28	0	47		0	28
DOMESTIC CORPORATIONS NOT FOREIGN-CONTROLLED								
All industries	13,657,411	11,123,685	1,222,727	75,847	134,422		15,653	327,208
Agriculture, forestry, fishing, and hunting	22,696	21,157	114	55	40		4	652
Mining	203,064	177,660	2,961	272	1,127		285	6,766
Utilities	598,404	552,440	9,810	2,902	69		159	1,743
Construction	238,313	229,675	1,826	549	237		39	240
Manufacturing	4,578,404	3,938,064	121,684	19,802	82,460		2,020	258,234
Wholesale and retail trade	2,941,330	2,840,069	17,157	4,588	10,228		836	14,386
Wholesale trade	1,250,180	1,204,833	9,686	2,431	4,100		778	10,229
Retail trade	1,691,150	1,635,236	7,471	2,157	6,128		58	4,157
Transportation and warehousing	391,479	370,563	3,305	1,497	1,978		53	855
Information	844,919	696,410	31,132	13,029	23,910		1,594	11,669
Finance and insurance	2,183,725	1,391,230	560,744	6,465	1,242		8,651	11,415
Real estate and rental and leasing	83,426	67,559	6,120	521	618		29	805
Professional, scientific, and technical services	239,347	221,127	4,311	312	4,554		54	2,602
Management of companies (holding companies)	764,167	111,973	456,130	23,828	444		1,837	10,735
Administrative and support and waste management and remediation services	171,470	152,781	2,421	357	1,541		32	1,255
Educational services	14,402	13,811	102	18	122		1	0
Health care and social assistance	159,102	151,906	996	496	131		23	277
Arts, entertainment, and recreation	21,558	18,639	485	147	148		15	14
Accommodation and food services	178,588	146,434	3,307	961	5,433		9	5,550
Other services	23,019	22,188	122	48	140		13	9

Footnotes at end of table.

Foreign-Controlled Domestic Corporations, 2005

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Table 4. "Large" Foreign-Controlled Domestic Corporations Compared to Other "Large" Domestic Corporations: Selected Items and Percentages, by Industrial Sector, Tax Year 2005—Continued

[Money amounts are in millions of dollars]

Control status and industrial sector	Deductions						
	Total	Cost of goods sold	Compensation of officers	Salaries and wages	Interest paid	Taxes paid	Depreciation
	(22)	(23)	(24)	(25)	(26)	(27)	(28)
FOREIGN-CONTROLLED DOMESTIC CORPORATIONS							
All industries	3,164,170	2,134,260	12,374	193,656	195,907	39,236	71,485
Agriculture, forestry, fishing, and hunting	1,049	659	12	53	49	19	45
Mining	38,892	23,014	142	2,266	1,385	879	2,154
Utilities	37,985	22,727	42	1,473	2,886	1,287	2,463
Construction	35,983	30,625	198	1,422	591	357	290
Manufacturing	1,535,227	1,194,762	3,819	66,146	39,159	16,072	37,205
Wholesale and retail trade	788,404	636,261	2,044	38,549	9,271	6,844	12,160
Wholesale trade	625,578	516,335	1,655	23,664	6,916	4,621	9,947
Retail trade	162,827	119,925	389	14,885	2,355	2,223	2,213
Transportation and warehousing	40,569	13,990	209	6,597	1,099	1,158	1,410
Information	70,819	23,832	410	10,601	6,302	1,273	3,951
Finance and insurance	407,336	136,243	3,897	28,808	99,238	4,544	4,994
Real estate and rental and leasing	15,353	3,912	174	2,475	1,709	469	2,644
Professional, scientific, and technical services	51,374	18,146	731	12,120	1,537	2,339	876
Management of companies (holding companies)	69,695	759	359	9,373	29,744	1,124	1,960
Administrative and support and waste management and remediation services	29,699	13,909	113	5,597	1,226	1,220	501
Educational services	847	276	23	198	31	24	13
Health care and social assistance	11,586	4,436	83	1,923	373	427	235
Arts, entertainment, and recreation	2,758	574	38	757	134	64	92
Accommodation and food services	24,078	8,923	60	4,863	1,120	1,068	470
Other services	2,515	1,212	19	435	52	68	23
DOMESTIC CORPORATIONS NOT FOREIGN-CONTROLLED							
All industries	12,551,699	6,984,208	71,976	1,255,848	939,778	251,045	329,818
Agriculture, forestry, fishing, and hunting	21,242	16,559	152	961	544	319	418
Mining	175,683	97,998	1,627	7,588	7,478	5,756	7,293
Utilities	580,031	345,271	2,105	22,168	32,965	19,975	33,162
Construction	218,377	170,122	2,162	10,044	2,871	3,337	1,827
Manufacturing	4,113,967	2,853,394	16,497	269,448	160,166	70,361	108,532
Wholesale and retail trade	2,821,436	2,187,363	9,388	235,451	27,422	38,326	31,473
Wholesale trade	1,206,670	1,020,308	5,000	58,877	12,277	9,852	9,028
Retail trade	1,614,766	1,167,055	4,388	176,574	15,144	28,474	22,444
Transportation and warehousing	379,965	101,703	1,602	78,147	10,602	13,451	20,639
Information	776,259	142,538	5,648	124,632	59,334	21,715	52,292
Finance and insurance	2,000,832	826,826	14,828	195,844	350,248	31,241	18,449
Real estate and rental and leasing	76,481	14,327	741	13,041	8,306	2,021	13,907
Professional, scientific, and technical services	231,489	72,877	4,831	62,796	6,049	6,599	4,095
Management of companies (holding companies)	628,431	4,776	7,226	100,705	254,347	13,902	22,982
Administrative and support and waste management and remediation services	158,657	68,367	1,147	28,823	5,023	7,259	3,625
Educational services	12,957	1,992	190	4,291	206	386	325
Health care and social assistance	153,070	21,182	1,528	55,677	4,296	6,077	3,352
Arts, entertainment, and recreation	20,517	3,306	269	4,438	1,436	1,363	1,144
Accommodation and food services	160,130	46,104	1,858	37,878	7,799	8,145	5,717
Other services	22,176	9,504	177	3,917	686	811	586

Footnotes at end of table.

Foreign-Controlled Domestic Corporations, 2005

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Table 4. "Large" Foreign-Controlled Domestic Corporations Compared to Other "Large" Domestic Corporations: Selected Items and Percentages, by Industrial Sector, Tax Year 2005—Continued

[Money amounts are in millions of dollars]

Control status and industrial sector	Total receipts less total deductions	Constructive taxable income from related foreign corporations	Net income (less deficit)	Net income	Deficit	Statutory special deductions	
						Total	Net operating loss deduction
	(29)	(30)	(31)	(32)	(33)	(34)	(35)
FOREIGN-CONTROLLED DOMESTIC CORPORATIONS							
All industries	153,306	6,202	157,959	181,513	-23,554	38,429	25,792
Agriculture, forestry, fishing, and hunting	91	0	91	116	-26	19	19
Mining	5,820	340	6,158	6,463	-305	2,532	2,011
Utilities	1,757	0	1,753	1,829	-76	1,169	1,115
Construction	1,751	1	1,752	2,099	-348	197	159
Manufacturing	78,708	3,225	81,643	90,884	-9,241	14,558	8,264
Wholesale and retail trade	25,665	534	26,083	28,880	-2,797	6,882	4,907
Wholesale trade	21,588	352	21,847	24,266	-2,419	5,466	3,941
Retail trade	4,077	181	4,237	4,614	-378	1,416	965
Transportation and warehousing	-158	22	-152	1,233	-1,384	331	262
Information	4,768	291	5,047	6,320	-1,273	3,160	2,446
Finance and insurance	14,644	717	14,998	21,075	-6,077	5,928	3,759
Real estate and rental and leasing	1,325	4	1,120	1,582	-462	684	664
Professional, scientific, and technical services	1,682	37	1,689	2,572	-883	1,038	937
Management of companies (holding companies)	13,748	994	14,236	14,360	-124	1,010	398
Administrative and support and waste management and remediation services	350	5	352	630	-278	235	228
Educational services	26	1	27	d	d	d	d
Health care and social assistance	1,409	0	1,408	1,454	-46	222	207
Arts, entertainment, and recreation	192	[2]	193	301	-108	15	1
Accommodation and food services	1,368	14	1,381	1,470	-89	420	388
Other services	162	17	180	d	d	d	d
DOMESTIC CORPORATIONS NOT FOREIGN-CONTROLLED							
All industries	1,105,712	108,883	1,187,940	1,283,601	-95,661	318,905	81,587
Agriculture, forestry, fishing, and hunting	1,454	74	1,523	1,681	-158	678	144
Mining	27,382	2,730	30,011	35,253	-5,242	6,274	3,747
Utilities	18,373	751	18,486	30,892	-12,406	5,502	4,015
Construction	19,936	78	19,977	20,731	-754	684	563
Manufacturing	464,437	79,017	539,873	560,300	-20,427	209,224	24,347
Wholesale and retail trade	119,894	5,878	124,561	132,729	-8,168	16,112	5,665
Wholesale trade	43,509	4,172	46,909	49,932	-3,022	9,905	2,597
Retail trade	76,384	1,706	77,652	82,797	-5,145	6,208	3,068
Transportation and warehousing	11,514	357	11,769	20,091	-8,322	1,736	1,069
Information	68,660	3,893	72,088	90,102	-18,014	24,908	15,918
Finance and insurance	182,893	8,303	176,589	185,385	-8,796	22,742	10,292
Real estate and rental and leasing	6,945	65	6,931	8,330	-1,399	4,369	3,902
Professional, scientific, and technical services	7,858	743	8,505	14,028	-5,523	4,686	2,731
Management of companies (holding companies)	135,735	6,109	136,603	137,367	-764	8,687	1,418
Administrative and support and waste management and remediation services	12,813	245	12,833	13,801	-969	5,357	4,448
Educational services	1,445	1	1,404	1,568	-164	62	62
Health care and social assistance	6,032	25	5,910	8,318	-2,408	1,246	1,047
Arts, entertainment, and recreation	1,041	12	1,033	1,570	-538	234	223
Accommodation and food services	18,458	597	19,005	20,265	-1,259	6,252	1,854
Other services	843	5	839	1,190	-351	152	143

Footnotes at end of table.

Foreign-Controlled Domestic Corporations, 2005

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Table 4. "Large" Foreign-Controlled Domestic Corporations Compared to Other "Large" Domestic Corporations: Selected Items and Percentages, by Industrial Sector, Tax Year 2005—Continued

[Money amounts are in millions of dollars]

Control status and industrial sector	Income subject to tax	Total income tax before credits	Income tax	Alternative minimum tax	Total credits	Foreign tax credit	Total income tax after credits
	(36)	(37)	(38)	(39)	(40)	(41)	(42)
FOREIGN-CONTROLLED DOMESTIC CORPORATIONS							
All industries	143,404	50,538	49,914	621	11,234	7,938	39,304
Agriculture, forestry, fishing, and hunting	98	34	34	0	1	0	33
Mining	3,932	1,587	1,375	212	776	706	811
Utilities	672	253	235	17	83	0	170
Construction	1,933	678	676	2	11	9	667
Manufacturing	76,618	26,930	26,790	144	7,616	5,595	19,314
Wholesale and retail trade	22,086	7,746	7,710	36	573	335	7,173
Wholesale trade	18,887	6,617	6,592	26	521	314	6,097
Retail trade	3,198	1,129	1,118	11	52	21	1,077
Transportation and warehousing	902	319	315	4	53	26	266
Information	3,204	1,154	1,120	34	114	47	1,040
Finance and insurance	14,966	5,147	5,013	131	992	716	4,155
Real estate and rental and leasing	898	322	314	8	53	8	269
Professional, scientific, and technical services	1,538	548	537	11	84	46	464
Management of companies (holding companies)	13,358	4,679	4,675	4	733	396	3,946
Administrative and support and waste management and remediation services	398	141	138	2	19	1	122
Educational services	d	d	d	d	d	d	d
Health care and social assistance	1,232	434	431	3	18	1	416
Arts, entertainment, and recreation	285	100	100	0	9	2	91
Accommodation and food services	1,067	391	377	11	76	26	314
Other services	d	d	d	d	d	d	d
DOMESTIC CORPORATIONS NOT FOREIGN-CONTROLLED							
All industries	970,476	341,713	339,277	2,411	93,616	72,534	248,097
Agriculture, forestry, fishing, and hunting	1,040	364	362	2	15	11	349
Mining	29,012	10,500	10,151	348	3,250	2,943	7,250
Utilities	25,801	9,224	9,029	190	1,660	96	7,563
Construction	20,048	7,015	7,002	7	205	60	6,809
Manufacturing	354,742	124,410	124,076	323	58,243	49,940	66,166
Wholesale and retail trade	117,182	40,987	40,914	91	3,821	2,880	37,165
Wholesale trade	40,389	14,137	14,098	52	2,588	1,998	11,549
Retail trade	76,793	26,849	26,816	39	1,233	882	25,616
Transportation and warehousing	18,406	6,457	6,436	21	745	327	5,712
Information	65,673	23,205	22,974	236	3,775	2,796	19,430
Finance and insurance	162,826	57,773	56,884	906	10,370	5,955	47,404
Real estate and rental and leasing	3,964	1,456	1,383	72	59	25	1,397
Professional, scientific, and technical services	9,714	3,430	3,391	38	633	393	2,797
Management of companies (holding companies)	128,638	45,066	44,988	45	8,928	6,067	36,138
Administrative and support and waste management and remediation services	8,454	3,041	2,954	87	420	165	2,620
Educational services	1,506	527	526	1	4	3	523
Health care and social assistance	7,079	2,491	2,472	19	59	17	2,432
Arts, entertainment, and recreation	1,338	470	468	2	75	43	395
Accommodation and food services	14,013	4,933	4,902	21	1,338	807	3,595
Other services	1,043	366	364	2	14	6	352

Footnotes at end of table.

Foreign-Controlled Domestic Corporations, 2005

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Table 4. "Large" Foreign-Controlled Domestic Corporations Compared to Other "Large" Domestic Corporations: Selected Items and Percentages, by Industrial Sector, Tax Year 2005—Continued

[Money amounts are in millions of dollars]

Control status and industrial sector	Percentages					
	Number of returns with net income	Number of returns with total income tax after credits	Current liabilities	Noncurrent liabilities	Net worth	Total liabilities divided by net worth
	Divided by total number of returns	Divided by total assets				
	(43)	(44)	(45)	(46)	(47)	(48)
FOREIGN-CONTROLLED DOMESTIC CORPORATIONS						
All industries	75.28	71.85	47.87	32.83	19.30	418.19
Agriculture, forestry, fishing, and hunting	75.00	66.67	13.79	40.48	45.73	118.67
Mining	70.51	66.67	15.92	31.61	52.47	90.58
Utilities	88.00	72.00	14.67	58.77	26.56	276.49
Construction	67.95	66.67	40.05	26.25	33.70	196.72
Manufacturing	72.50	68.83	49.83	26.82	23.34	328.43
Wholesale and retail trade	81.70	78.93	43.37	28.65	27.98	257.46
Wholesale trade	82.60	79.96	45.92	26.46	27.62	262.05
Retail trade	75.00	71.09	32.00	38.44	29.55	238.37
Transportation and warehousing	76.62	71.43	21.55	38.70	39.75	151.58
Information	65.14	59.63	14.41	25.34	60.25	65.97
Finance and insurance	76.47	74.84	45.94	41.41	12.65	690.39
Real estate and rental and leasing	68.66	68.66	22.89	46.41	30.69	225.81
Professional, scientific, and technical services	73.33	67.78	32.72	22.14	45.14	121.52
Management of companies (holding companies)	74.70	67.47	77.98	12.36	9.66	934.95
Administrative and support and waste management and remediation services	73.24	69.01	22.64	41.71	35.65	180.50
Educational services	d	d	34.56	23.18	42.26	136.65
Health care and social assistance	65.00	65.00	14.19	34.27	51.54	94.03
Arts, entertainment, and recreation	36.84	36.84	34.34	35.16	30.50	227.89
Accommodation and food services	66.67	66.67	13.40	47.93	38.66	158.63
Other services	d	d	26.92	51.11	21.97	355.12
DOMESTIC CORPORATIONS NOT FOREIGN-CONTROLLED						
All industries	78.33	75.65	48.33	28.08	23.59	323.94
Agriculture, forestry, fishing, and hunting	80.18	75.68	27.02	54.58	18.41	443.25
Mining	75.11	74.67	17.10	37.58	45.32	120.67
Utilities	69.89	66.67	24.01	52.18	23.81	319.98
Construction	86.33	87.37	30.55	34.44	35.00	185.68
Manufacturing	74.49	70.33	30.13	29.51	40.36	147.74
Wholesale and retail trade	82.07	79.49	31.26	23.21	45.53	119.64
Wholesale trade	85.30	83.23	29.12	20.15	50.73	97.13
Retail trade	78.00	74.73	33.42	26.30	40.28	148.28
Transportation and warehousing	72.80	70.50	22.95	58.70	18.35	444.90
Information	59.30	56.37	19.82	35.60	44.58	124.30
Finance and insurance	84.55	82.96	50.46	34.41	15.13	560.90
Real estate and rental and leasing	70.24	66.07	28.80	45.76	25.44	293.09
Professional, scientific, and technical services	69.58	65.27	35.97	26.13	37.90	163.82
Management of companies (holding companies)	95.54	95.38	73.11	13.29	13.60	635.43
Administrative and support and waste management and remediation services	70.72	68.54	22.36	42.34	35.30	183.28
Educational services	63.46	59.62	27.51	26.90	45.60	119.33
Health care and social assistance	57.37	50.10	20.93	45.65	33.43	199.18
Arts, entertainment, and recreation	58.73	55.56	15.91	45.96	38.13	162.26
Accommodation and food services	71.37	67.18	16.98	50.35	32.67	206.10
Other services	71.25	66.25	16.41	46.50	37.10	169.57

Footnotes at end of table.

Foreign-Controlled Domestic Corporations, 2005

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Table 4. "Large" Foreign-Controlled Domestic Corporations Compared to Other "Large" Domestic Corporations: Selected Items and Percentages, by Industrial Sector, Tax Year 2005—Continued

[Money amounts are in millions of dollars]

Control status and industrial sector	Percentages—continued					
	Total receipts divided by total assets	Cost of goods sold divided by business receipts	Interest paid divided by total receipts	Total receipts less total deductions divided by		
				Total assets	Net worth	Total receipts
	(49)	(50)	(51)	(52)	(53)	(54)
FOREIGN-CONTROLLED DOMESTIC CORPORATIONS						
All industries	37.84	73.69	5.91	1.75	9.06	4.62
Agriculture, forestry, fishing, and hunting	68.06	63.55	4.30	5.43	11.88	7.98
Mining	47.26	54.61	3.10	6.15	11.72	13.02
Utilities	42.30	59.91	7.26	1.87	7.04	4.42
Construction	132.57	85.32	1.57	6.15	18.25	4.64
Manufacturing	68.93	78.44	2.43	3.36	14.40	4.88
Wholesale and retail trade	168.52	80.71	1.14	5.31	18.99	3.15
Wholesale trade	164.06	82.53	1.07	5.47	19.81	3.34
Retail trade	188.37	73.71	1.41	4.60	15.57	2.44
Transportation and warehousing	87.56	36.29	2.72	-0.34	-0.86	-0.39
Information	25.08	37.07	8.34	1.58	2.63	6.31
Finance and insurance	10.25	62.27	23.52	0.36	2.81	3.47
Real estate and rental and leasing	26.46	30.55	10.25	2.10	6.85	7.94
Professional, scientific, and technical services	50.10	36.56	2.90	1.59	3.52	3.17
Management of companies (holding companies)	8.47	4.56	35.65	1.40	14.44	16.48
Administrative and support and waste management and remediation services						
Educational services	95.23	48.65	4.08	1.11	3.11	1.16
Health care and social assistance	76.38	32.66	3.55	2.27	5.38	2.98
Arts, entertainment, and recreation	58.79	36.66	2.87	6.38	12.37	10.84
Accommodation and food services	71.29	25.51	4.54	4.64	15.21	6.51
Other services	56.72	43.57	4.40	3.05	7.89	5.38
DOMESTIC CORPORATIONS NOT FOREIGN-CONTROLLED						
All industries	33.25	62.79	6.88	2.69	11.41	8.10
Agriculture, forestry, fishing, and hunting	108.91	78.27	2.40	6.98	37.90	6.41
Mining	51.55	55.16	3.68	6.95	15.34	13.48
Utilities	43.42	62.50	5.51	1.33	5.60	3.07
Construction	131.35	74.07	1.20	10.99	31.39	8.37
Manufacturing	61.72	72.46	3.50	6.26	15.51	10.14
Wholesale and retail trade	166.19	77.02	0.93	6.77	14.88	4.08
Wholesale trade	140.58	84.68	0.98	4.89	9.64	3.48
Retail trade	192.06	71.37	0.90	8.67	21.54	4.52
Transportation and warehousing	90.10	27.45	2.71	2.65	14.44	2.94
Information	33.96	20.47	7.02	2.76	6.19	8.13
Finance and insurance	15.71	59.43	16.04	1.32	8.70	8.38
Real estate and rental and leasing	38.63	21.21	9.96	3.22	12.64	8.32
Professional, scientific, and technical services	73.27	32.96	2.53	2.41	6.35	3.28
Management of companies (holding companies)	6.43	4.27	33.28	1.14	8.40	17.76
Administrative and support and waste management and remediation services						
Educational services	97.44	44.75	2.93	7.28	20.62	7.47
Health care and social assistance	94.38	14.42	1.43	9.47	20.77	10.03
Arts, entertainment, and recreation	103.75	13.94	2.70	3.93	11.77	3.79
Accommodation and food services	48.28	17.74	6.66	2.33	6.11	4.83
Other services	73.70	31.48	4.37	7.62	23.32	10.34
	77.21	42.83	2.98	2.83	7.62	3.66

Footnotes at end of table.

Foreign-Controlled Domestic Corporations, 2005

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Table 4. "Large" Foreign-Controlled Domestic Corporations Compared to Other "Large" Domestic Corporations: Selected Items and Percentages, by Industrial Sector, Tax Year 2005—Continued

[Money amounts are in millions of dollars]

Control status and industrial sector	Percentages—continued			
	Net income (less deficit) divided by			Net operating loss deduction divided by net income
	Total assets	Net worth	Total receipts	
	(55)	(56)	(57)	(58)
FOREIGN-CONTROLLED DOMESTIC CORPORATIONS				
All industries	1.80	9.34	4.76	14.21
Agriculture, forestry, fishing, and hunting	5.43	11.88	7.98	16.38
Mining	6.51	12.40	13.77	31.12
Utilities	1.87	7.03	4.41	60.96
Construction	6.16	18.26	4.64	7.58
Manufacturing	3.49	14.94	5.06	9.09
Wholesale and retail trade	5.40	19.30	3.20	16.99
Wholesale trade	5.54	20.05	3.38	16.24
Retail trade	4.78	16.18	2.54	20.91
Transportation and warehousing	-0.33	-0.83	-0.38	21.25
Information	1.67	2.78	6.68	38.70
Finance and insurance	0.36	2.88	3.55	17.84
Real estate and rental and leasing	1.78	5.79	6.72	41.97
Professional, scientific, and technical services	1.59	3.53	3.18	36.43
Management of companies (holding companies)	1.44	14.95	17.06	2.77
Administrative and support and waste management and remediation services	1.12	3.13	1.17	36.19
Educational services	2.36	5.59	3.09	d
Health care and social assistance	6.37	12.36	10.84	14.24
Arts, entertainment, and recreation	4.66	15.29	6.54	0.33
Accommodation and food services	3.08	7.96	5.43	26.39
Other services	6.75	30.72	6.72	d
DOMESTIC CORPORATIONS NOT FOREIGN-CONTROLLED				
All industries	2.89	12.26	8.70	6.36
Agriculture, forestry, fishing, and hunting	7.31	39.70	6.71	8.57
Mining	7.62	16.81	14.78	10.63
Utilities	1.34	5.63	3.09	13.00
Construction	11.01	31.45	8.38	2.72
Manufacturing	7.28	18.03	11.79	4.35
Wholesale and retail trade	7.04	15.46	4.23	4.27
Wholesale trade	5.27	10.40	3.75	5.20
Retail trade	8.82	21.89	4.59	3.71
Transportation and warehousing	2.71	14.76	3.01	5.32
Information	2.90	6.50	8.53	17.67
Finance and insurance	1.27	8.40	8.09	5.55
Real estate and rental and leasing	3.21	12.61	8.31	46.84
Professional, scientific, and technical services	2.60	6.87	3.55	19.47
Management of companies (holding companies)	1.15	8.45	17.88	1.03
Administrative and support and waste management and remediation services	7.29	20.66	7.48	32.23
Educational services	9.20	20.18	9.75	3.95
Health care and social assistance	3.85	11.53	3.71	12.59
Arts, entertainment, and recreation	2.31	6.07	4.79	14.20
Accommodation and food services	7.84	24.01	10.64	9.15
Other services	2.81	7.59	3.64	12.02

Footnotes at end of table.

Foreign-Controlled Domestic Corporations, 2005

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Table 4. "Large" Foreign-Controlled Domestic Corporations Compared to Other "Large" Domestic Corporations: Selected Items and Percentages, by Industrial Sector, Tax Year 2005—Continued

[Money amounts are in millions of dollars]

Control status and industrial sector	Percentages—continued					
	Income subject to tax divided by			Total income tax after credits divided by		
	Total assets	Net worth	Total receipts	Total assets	Net worth	Total receipts
	(59)	(60)	(61)	(62)	(63)	(64)
FOREIGN-CONTROLLED DOMESTIC CORPORATIONS						
All industries	1.64	8.48	4.32	0.45	2.32	1.18
Agriculture, forestry, fishing, and hunting	5.85	12.79	8.60	1.97	4.31	2.89
Mining	4.16	7.92	8.79	0.86	1.63	1.81
Utilities	0.72	2.69	1.69	0.18	0.68	0.43
Construction	6.79	20.15	5.12	2.34	6.95	1.77
Manufacturing	3.27	14.02	4.75	0.82	3.53	1.20
Wholesale and retail trade	4.57	16.34	2.71	1.48	5.31	0.88
Wholesale trade	4.79	17.33	2.92	1.55	5.60	0.94
Retail trade	3.61	12.21	1.92	1.22	4.11	0.65
Transportation and warehousing	1.95	4.92	2.23	0.58	1.45	0.66
Information	1.06	1.76	4.24	0.35	0.57	1.38
Finance and insurance	0.36	2.87	3.55	0.10	0.80	0.98
Real estate and rental and leasing	1.42	4.64	5.38	0.43	1.39	1.61
Professional, scientific, and technical services	1.45	3.22	2.90	0.44	0.97	0.87
Management of companies (holding companies)	1.36	14.03	16.01	0.40	4.14	4.73
Administrative and support and waste management and remediation services	1.26	3.54	1.32	0.39	1.08	0.41
Educational services	d	d	d	d	d	d
Health care and social assistance	5.57	10.82	9.48	1.88	3.65	3.20
Arts, entertainment, and recreation	6.89	22.58	9.66	2.20	7.21	3.08
Accommodation and food services	2.38	6.15	4.19	0.70	1.81	1.23
Other services	d	d	d	d	d	d
DOMESTIC CORPORATIONS NOT FOREIGN-CONTROLLED						
All industries	2.36	10.02	7.11	0.60	2.56	1.82
Agriculture, forestry, fishing, and hunting	4.99	27.11	4.58	1.67	9.10	1.54
Mining	7.37	16.25	14.29	1.84	4.06	3.57
Utilities	1.87	7.86	4.31	0.55	2.30	1.26
Construction	11.05	31.57	8.41	3.75	10.72	2.86
Manufacturing	4.78	11.85	7.75	0.89	2.21	1.45
Wholesale and retail trade	6.62	14.54	3.98	2.10	4.61	1.26
Wholesale trade	4.54	8.95	3.23	1.30	2.56	0.92
Retail trade	8.72	21.65	4.54	2.91	7.22	1.51
Transportation and warehousing	4.24	23.08	4.70	1.31	7.16	1.46
Information	2.64	5.92	7.77	0.78	1.75	2.30
Finance and insurance	1.17	7.74	7.46	0.34	2.25	2.17
Real estate and rental and leasing	1.84	7.21	4.75	0.65	2.54	1.67
Professional, scientific, and technical services	2.97	7.85	4.06	0.86	2.26	1.17
Management of companies (holding companies)	1.08	7.96	16.83	0.30	2.24	4.73
Administrative and support and waste management and remediation services	4.80	13.61	4.93	1.49	4.22	1.53
Educational services	9.87	21.64	10.46	3.43	7.52	3.63
Health care and social assistance	4.62	13.81	4.45	1.59	4.74	1.53
Arts, entertainment, and recreation	3.00	7.86	6.21	0.88	2.32	1.83
Accommodation and food services	5.78	17.70	7.85	1.48	4.54	2.01
Other services	3.50	9.43	4.53	1.18	3.18	1.53

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

[1] Excludes nontaxable interest received on State and local government obligations, which totaled \$26.7 billion for large domestic corporations not foreign-controlled, and \$1.5 billion for large foreign-controlled domestic corporations.

[2] Less than \$500,000.

NOTES: "Large" corporations are those with total assets of \$250,000,000 or more, and/or with business receipts of \$50,000,000 or more (total receipts were used in lieu of business receipts for the finance and insurance, and management of companies sectors). Data exclude Forms 1120-REIT (real estate investment trusts), 1120-RIC (regulated investment companies), and 1120S (S corporations). Data also exclude returns in which the foreign ownership level is between 25 percent and 49 percent. Percentages shown in table were calculated using rounded data. Detail may not add to totals because of rounding.

Controlled Foreign Corporations, 2004

by Lee Mahony and Randy Miller

For Tax Year 2004, foreign corporations controlled by U.S. multinational corporations held \$9.2 trillion in assets and reported receipts of \$3.8 trillion. These controlled foreign corporations (CFCs) paid \$69.3 billion in income taxes on \$362.2 billion of earnings and profits (E&P) before income taxes.

Approximately 79.0 percent, or 58,992, of CFCs for Tax Year 2004 were concentrated in three major industrial sectors: (1) goods production; (2) distribution and transportation of goods; and (3) services. These three industrial sectors accounted for 84.7 percent of total receipts (\$3.2 trillion), 72.6 percent of E&P (less deficit) before income taxes (\$263.1 billion), and 67.1 percent of income taxes (\$46.5 billion). Foreign corporations in the finance, insurance, real estate, and rental and leasing sector held 42.5 percent of total CFC assets (\$3.9 trillion), while generating only 9.4 percent of total CFC receipts (\$356.0 billion) and 16.0 percent of total CFC E&P (less deficit) before income taxes (\$57.9 billion).

For Tax Year 2004, 74,676 CFCs were incorporated in 185 different countries.¹ Over 45 percent, or 33,719, of these CFCs were incorporated in Europe. Slightly more than 91 percent of these European CFCs were located in European Union countries. Latin America and Asia domiciled 14.3 percent and 19.2 percent of all CFCs, respectively.

Controlled Foreign Corporations

Direct foreign investment by U.S. persons may take several forms, including foreign branches, partnerships, and separate corporations. This article deals with the use of the corporation as a vehicle for direct foreign investment. For U.S. income tax purposes, a foreign corporation is “controlled” if U.S. shareholders own more than 50 percent of its outstanding voting stock, or more than 50 percent of the value of all its outstanding stock (directly, indirectly, or construc-

tively) on any day during the foreign corporation’s tax year. A “noncontrolled” foreign corporation is any foreign corporation that fails to meet either of the above requirements for control. For purposes of determining control, a U.S. shareholder is defined as a U.S. person who owns 10 percent or more of the foreign corporation’s total combined voting stock.² However, for Statistics of Income purposes, a foreign corporation is controlled only if one U.S. corporation satisfies either of the above 50-percent ownership requirements for an uninterrupted period of at least 30 days during the foreign corporation’s tax year.³ For Tax Year 2004, there were 10,939 U.S. corporations that held such control over at least one foreign corporation.

In general, the income of a CFC is not taxable to the U.S. shareholders until repatriated in the form of a dividend. Prior to 1962, U.S. taxpayers could defer U.S. tax on such income indefinitely by accumulating this income in a CFC. To address the potential for tax avoidance, Congress enacted the Subpart F provisions of the Internal Revenue Code in 1962.⁴ These provisions require certain items of income to be treated as dividends deemed paid to the U.S. shareholders and, therefore, subject to U.S. taxation. Currently, a U.S. shareholder of a CFC may be required to include in gross income the shareholder’s ratable share of the CFC’s: (1) Subpart F income (see Subpart F income in the Explanation of Selected Terms section of this article); (2) earnings invested in U.S. property; (3) previously excluded Subpart F income withdrawn from “qualified investments” in less developed countries and in “foreign base company” shipping operations; (4) previously excluded export trade income withdrawn from investment in export trade assets; and (5) factoring income (income derived from the acquisition of a trade or service receivable).

CFCs by Industrial Sector

For Tax Year 2004, goods producers accounted for 20.2 percent of end-of-year assets and 43.0 percent of total receipts (see Figure A). These CFCs earned 34.6 percent of E&P (less deficit) before income taxes

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¹ Based on unpublished data.

² The current definition of a Controlled Foreign Corporation is provided in Internal Revenue Code section 957. Ownership attribution rules are provided in section 958.

³ The statistics in this article pertain only to foreign corporations for which one U.S. corporation satisfies the requirements for control. Generally, complete Form 5471 filings are required only for foreign corporations controlled by a single U.S. shareholder (i.e., those shareholders meeting the definition of a “Category of Filer 4” taxpayer per the Form 5471 instructions). Partial filing requirements exist for noncontrolled foreign corporations and for controlled foreign corporations which are not controlled by a single U.S. shareholder. For more details, refer to the instructions for Form 5471.

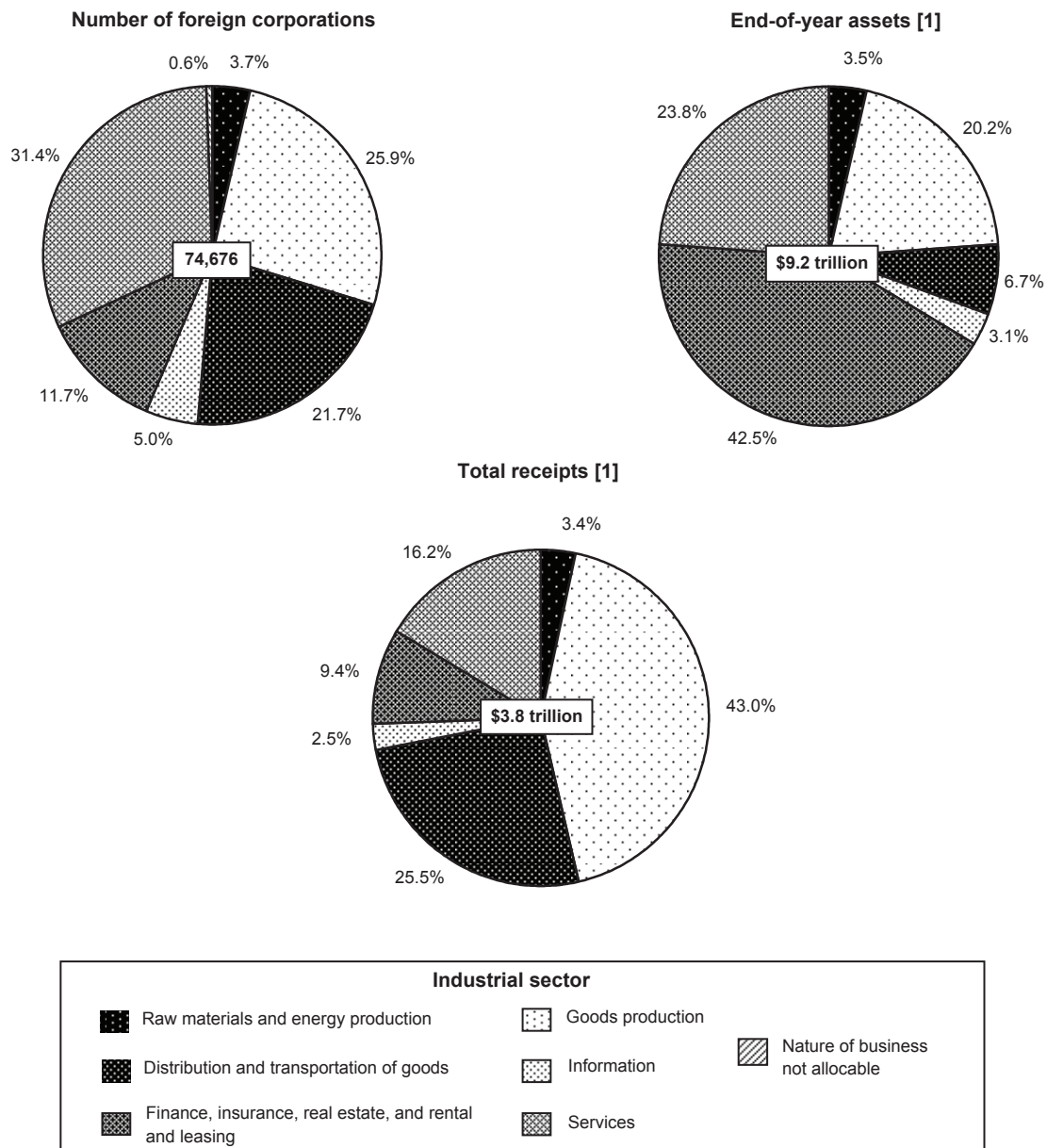
⁴ The prevention of tax avoidance was a primary tax policy objective that led to the enactment of the Subpart F provisions of the Internal Revenue Code. Other policy considerations also contributed to the enactment of Subpart F. For more detailed information on the history of Subpart F, see “*The Deferral of Income Earned Through U.S. Controlled Foreign Corporations: A Policy Study*,” Office of Tax Policy, Department of the Treasury, December 2000.

Controlled Foreign Corporations, 2004

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Figure A

U.S. Corporations and Their Controlled Foreign Corporations: Number, End-of-Year Assets, and Receipts, by Industrial Sector of Controlled Foreign Corporation, Tax Year 2004



[1] Includes "Nature of business not allocable," not shown separately.
NOTE: Detail may not add to 100 percent because of rounding.

for all corporate-owned CFCs. Goods producers paid \$22.3 billion of foreign taxes, representing 32.2 percent of all taxes paid by CFCs. Chemical, computer and electronic products, petroleum and coal products, and transportation equipment manufacturers collectively reported 61.4 percent of end-of-year assets, 61.0 percent of total receipts, and 58.0 percent of E&P (less deficits) before income taxes for all goods producers. Chemical manufacturers alone generated 32.7 percent of E&P (less deficit) before income taxes and 23.9 percent of foreign income taxes reported by all goods producers.

For Tax Year 2004, CFCs engaged in finance, insurance, real estate, and rental and leasing held 42.5 percent of all assets while generating only 9.4 percent of total receipts and 16.0 percent of E&P (less deficit) before income taxes reported by all CFCs. More than \$3.3 trillion, or 85.3 percent, of the assets reported for this industrial sector were attributable to finance corporations. These finance corporations amassed 65.8 percent of receipts and 70.0 percent of E&P (less deficit) before income taxes for this industrial sector. Insurance subsidiaries reported nearly \$0.5 trillion in assets and nearly \$0.1 trillion in receipts, representing 12.0 percent and 27.7 percent of total assets and total receipts for this sector, respectively.

There were more CFCs in the services sector than any other industrial sector. More than 31 percent of all CFCs were classified as service corporations. Service providers reported nearly \$2.2 trillion in assets and more than \$0.6 trillion in receipts. However, excluding management and holding companies, CFCs classified in the services sector reported only \$0.4 trillion in assets and \$0.3 trillion in receipts.

Geographic Distribution of CFCs

Figure B shows the geographic distribution of CFCs by major region of incorporation. For Tax Year 2004, Europe remained the dominant region for CFC activity. Europe alone accounted for 62.2 percent of end-of-year assets, 54.3 percent of total receipts, and 49.8 percent of E&P (less deficit) before income taxes for all CFCs. European CFCs paid 46.9 percent of the \$69.3 billion of foreign income taxes reported by all CFCs for Tax Year 2004. Within Europe, most CFC activity was concentrated in European Union (EU) countries. More than 91 percent of European

CFCs were incorporated in EU countries. These CFCs reported 92.8 percent of ending assets, 90.6 percent of total receipts, and 86.7 percent of E&P (less deficit) before income taxes for all European CFCs. More than 47 percent of European CFCs not incorporated in EU countries were incorporated in Switzerland. These Swiss CFCs accounted for 79.6 percent of ending assets, 81.7 percent of receipts, and 72.4 percent of E&P (less deficit) before income taxes for non-EU European CFCs.

Other Western Hemisphere countries (which includes Canada) and Asia also were significant regions of CFC activity. CFCs conducting business in the Other Western Hemisphere countries held 19.5 percent of all CFC end-of-year assets and reported 18.4 percent of all CFC receipts. These CFCs reported 24.0 percent of E&P (less deficit) before income taxes and paid 22.7 percent of foreign income taxes paid by all CFCs. Within the Other Western Hemisphere region, Canada was home to most CFC activity. Canadian CFCs generated 60.2 percent of total receipts, 46.7 percent of E&P (less deficit) before income taxes, and 55.5 percent of foreign income taxes for CFCs in this region. With 6,559 CFCs, Canada had more CFCs than any other country except the United Kingdom (8,227). CFCs in Asia reported 9.5 percent of ending assets, 15.1 percent of total receipts, and 13.6 percent of E&P (less deficit) before income taxes for all CFCs. More CFC economic activity occurred in Japan than any other Asian country. Japanese CFCs accounted for 44.9 percent of ending assets, 34.7 percent of total receipts, and 30.7 percent of E&P (less deficit) before income taxes reported by all Asian CFCs. For Tax Year 2004, there were almost as many CFCs incorporated in China (2,264) as Japan (2,265). In fact, for Tax Year 2004, only 8 countries had more CFCs than China.⁵

The two geographic groupings with the smallest CFC representation were Africa and U.S. Possessions (including Puerto Rico). Only 2.7 percent of all CFCs were incorporated in these two regions. Collectively, these two regions accounted for less than 1.0 percent of end-of-year assets, 1.4 percent of total receipts, and 1.7 percent of E&P (less deficit) before income taxes for all CFCs. Within Africa, most CFC activity was concentrated in four countries. South Africa, Liberia, Mauritius, and Egypt

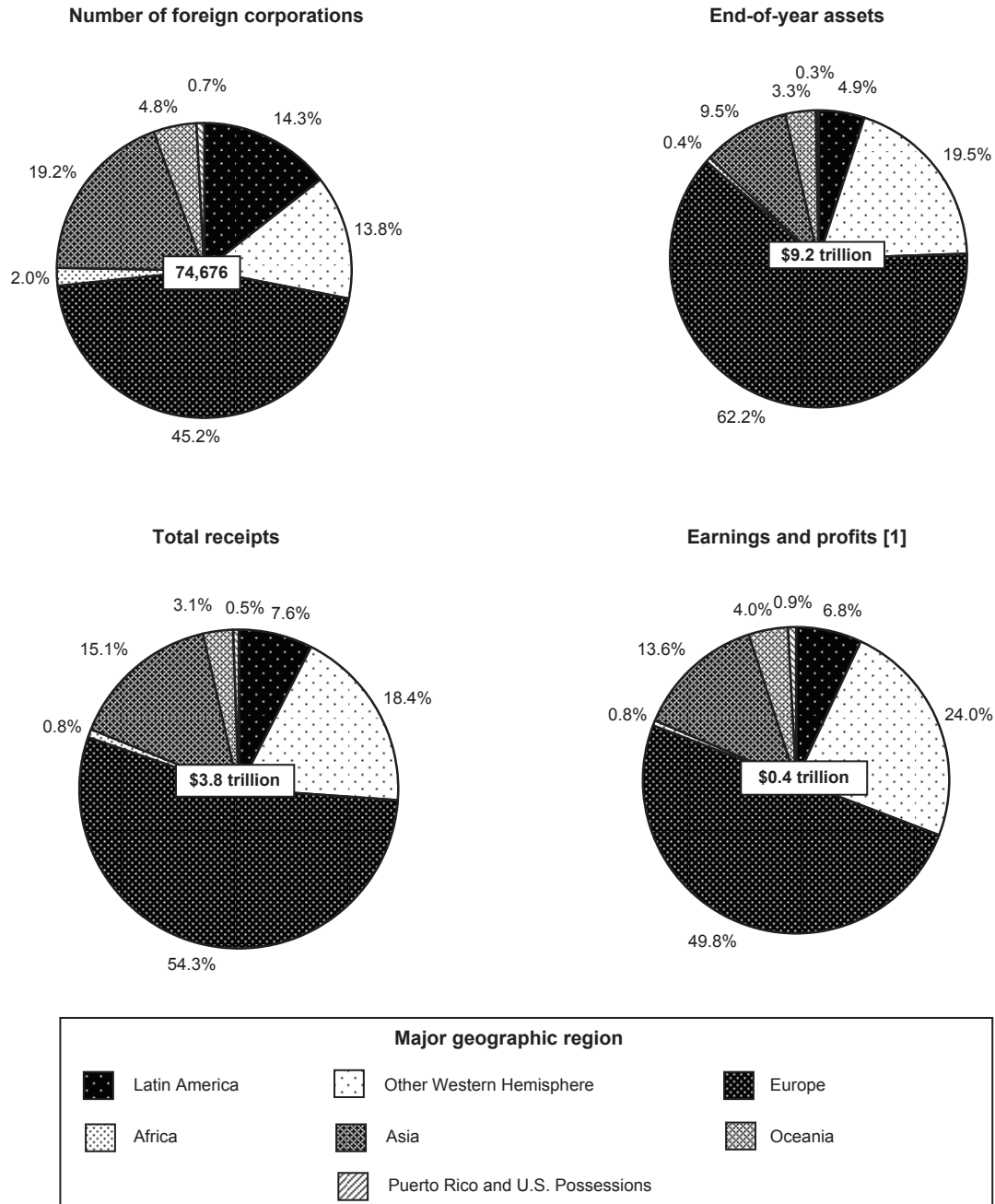
⁵ The countries with the most CFCs are: United Kingdom (8,227), Canada (6,559), Mexico (4,618), Germany (4,121), France (3,857), Netherlands (3,151), Australia (2,807), Japan (2,265), China (2,264), and Hong Kong (1,800).

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Figure B

U.S. Corporations and Their Controlled Foreign Corporations: Number, End-of-Year Assets, Receipts, and Earnings, by Geographic Region of Incorporation of Controlled Foreign Corporation, Tax Year 2004



[1] Less deficits and before income taxes.

NOTE: Includes "Other country or country unknown," not shown separately. Detail may not add to 100 percent because of rounding.

collectively accounted for 76.7 percent of ending assets, 75.4 percent of total receipts, and 94.2 percent of E&P (less deficit) before income taxes for all African CFCs. South Africa alone had 41.2 percent of African CFCs. South African CFCs reported 35.2 percent of ending assets, 54.4 percent of total receipts, and 58.9 percent of E&P (less deficit) before income taxes reported by all African CFCs. Most CFC activity in the U.S. possessions is attributable to Puerto Rico. Puerto Rican CFCs held 89.3 percent of ending assets and generated 90.2 percent of total receipts reported by all CFCs operating in the U.S. possessions. For Tax Year 2004, the average tax rate for CFCs incorporated in Puerto Rico and U.S. Possessions was 8.7 percent, compared to the average tax rate of 19.2 percent for all other CFCs (see *Average Tax Rate* in the Explanation of Selected Terms section of this article). CFCs incorporated in African countries had the highest average tax rate of any region at 29.7 percent.

Profitability

For purposes of this article, two measures are used to assess pretax profitability for CFCs: rate of return on assets and profit margin. Rate of return on assets is defined as current E&P (less deficit) before income taxes divided by end-of-year assets. Profit margin is defined as current E&P (less deficit) before income taxes divided by total receipts.

For Tax Year 2004, profitability measures varied among the six different major industrial sectors. CFCs engaged in raw materials and energy production reported both the highest rate of return on assets (10.2 percent) and the highest profit margin (26.1 percent). The high profitability of this sector is attributable to CFCs in the mining subsector. The return on assets and profit margin for mining CFCs were 11.9 percent and 33.6 percent, respectively. CFCs in the utilities subsector reported a 6.5-percent return on assets and a 13.3-percent profit margin, while CFCs engaged in agriculture, forestry, and fishing reported only a 3.8-percent return on assets and an 8.5-percent profit margin.

CFCs engaged in the distribution and transportation of goods sector reported the second highest return on assets percentage (8.5 percent). These CFCs, however, also reported the lowest profit margin of any sector (5.4 percent). Conversely, CFCs in the finance, insurance, real estate, and rental and leasing sector reported the second highest profit margin (16.3

percent), while reporting the lowest return on assets (1.5 percent).

Distributions of Earnings and Profits

For Tax Year 2004, CFCs distributed \$135.2 billion of E&P to U.S. and foreign shareholders. Nearly 68 percent of distributions of E&P were from not previously taxed E&P (\$91.4 billion), while the remainder was distributed from previously taxed E&P (\$43.8 billion). More than 34 percent of CFC distributions (\$46.6 billion) represented taxable dividends to the U.S. parent corporation.

The majority of distributions of E&P are attributed to CFCs doing business in the goods production and services sectors. These two industrial sectors distributed \$75.1 billion of E&P or 55.6 percent of total distributions. Of this total, \$49.0 billion were from not previously taxed E&P, with the remaining \$26.1 billion coming from previously taxed E&P. Almost 21.4 percent of distributions by goods producers were attributable to chemical manufacturers, while an additional 12.3 percent were attributable to petroleum and coal products manufacturers. CFCs classified as management companies reported 81.6 percent of distributions to shareholders reported by all services CFCs.

European-based CFCs accounted for 49.2 percent (\$66.5 billion) of all distributions of E&P. Nearly 62.0 percent of these distributions were from not previously taxed E&P (\$41.2 billion), with the remainder distributed from previously taxed E&P (\$25.3 billion). CFCs incorporated in European Union countries made 88.1 percent of all shareholder distributions by European CFCs. CFCs in the Other Western Hemisphere region distributed \$37.7 billion of E&P in Tax Year 2004, or 27.9 percent of all distributions. Canadian CFCs accounted for 61.6 percent of these distributions; CFCs in Bermuda and the Cayman Islands accounted for 22.5 percent and 11.1 percent, respectively.

Figure C displays taxable payout ratios by industrial sector. The taxable payout ratio is defined as taxable dividends paid to a U.S. person by a CFC with positive current E&P net of current-year Subpart F income divided by positive current E&P net of current-year Subpart F income (see U.S. person, Current earnings and profits, and Subpart F Income in the Explanation of Selected Terms section of this article). For Tax Year 2004, CFCs reported a taxable payout ratio of 8.8 percent. This ratio is lower than the tax-

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Figure C

U.S. Corporations and Their Controlled Foreign Corporations: Number of Foreign Corporations with Positive Current Earnings and Profits Net of Current-Year Subpart F Income and Taxable Payout Ratios, by Industrial Sector of Controlled Foreign Corporation, Tax Year 2004

[Money amounts are in thousands of dollars]

Industrial sector of Controlled Foreign Corporation	Number of foreign corporations with positive current earnings and profits net of current-year Subpart F income	Positive current earnings and profits net of current-year Subpart F income [1]	Taxable payout ratio (percentage)
	(1)	(2)	(3)
All industries	41,931	294,649,031	8.8
Raw materials and energy production	1,124	24,283,854	22.0
Goods production	12,037	105,657,597	8.3
Distribution and transportation of goods	10,156	36,582,974	5.9
Information	1,810	9,526,661	21.4
Finance, insurance, real estate, and rental and leasing	4,363	45,291,578	3.8
Services	12,252	73,222,646	8.3
Nature of business not allocable	189	83,721	0.3

[1] Amounts are multiplied by the total percentage of voting stock owned by the Form 5471 filer at the end of its annual accounting period.

able payout ratio reported for the previous three CFC studies (10.3 percent for Tax Year 2002, 11.9 percent for Tax Year 2000, and 16.0 for Tax Year 1998).

The taxable payout ratio varied considerably among the industrial sectors. CFCs in the raw materials and energy production sector reported the largest taxable payout ratio (22.0 percent). CFCs in the information sector also reported a substantial taxable payout ratio (21.4 percent). No other industrial sector had a double-digit taxable payout ratio.

Largest 7,500 Controlled Foreign Corporations

For Tax Year 2004, the largest 7,500 CFCs held \$8.5 trillion in assets and reported receipts of \$3.0 trillion.⁶ These amounts increased from Tax Year 2002 by 45.7 percent and 30.7 percent, respectively. These 7,500 CFCs reported foreign taxes of \$54.4 billion on pretax earnings and profits of \$313.1 billion, increases from Tax Year 2002 of 40.9 percent and 56.0 percent, respectively. These foreign corporations distributed \$113.0 billion of E&P to all shareholders during Tax Year 2004.⁷ Of these distributions, \$37.3 billion represented taxable remittances to U.S. parent corporations. U.S. parent corporations were required to include an additional \$40.4 billion

in taxable income attributable to these largest 7,500 CFCs under the subpart F income rules.

As Figure D shows, 80.5 percent of the largest 7,500 CFCs conducted business in three industrial sectors: services (28.0 percent), goods production (27.8 percent), and finance, insurance, real estate, and rental and leasing (24.7 percent). These sectors accounted for 87.8 percent of ending assets, 70.4 percent of total receipts, and 74.7 percent of E&P (less deficit) before income taxes for the largest 7,500 CFCs. Among the largest 7,500 CFCs, service corporations experienced the most significant economic growth from Tax Year 2002 to Tax Year 2004. Ending assets and receipts for these service corporations increased by 67.0 percent and 88.7 percent, respectively. For Tax Year 2004, service corporations earned 75.4 percent more in E&P (less deficit) before income taxes and paid 107.5 percent more in foreign income taxes than for Tax Year 2002. For the largest 7,500 CFCs, raw materials and energy production was the only sector to experience a decrease in ending assets (1.0 percent) and total receipts (2.5 percent). However, CFCs in this sector reported increases in E&P (less deficit) before income taxes and foreign income taxes of 77.3 percent and 63.8

⁶ The SOI Controlled Foreign Corporation Study has changed from a defined population to a sample. In prior studies, data generally were published only for the largest 7,500 foreign corporations controlled by large U.S. multinationals. Beginning with Tax Year 2004, SOI is publishing population estimates for controlled foreign corporations. For transitional purposes, this article includes limited data for the 7,500 largest controlled foreign corporations. Tax Year 2004 is the last year for which statistics will be reported for the largest 7,500 controlled foreign corporations.

⁷ Based on unpublished data.

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Figure D

U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Net Income, Earnings, Taxes, Dividends, and Subpart F Income, by Industrial Sector of Controlled Foreign Corporation, Tax Year 2004

[Money amounts are in thousands of dollars]

Industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations				
		Number of foreign corporations	Total assets		Total receipts	Net income (less deficit) before income taxes
			Beginning-of- year	End-of-year		
	(1)	(2)	(3)	(4)	(5)	(6)
All industries	1,135	7,500	6,979,508,476	8,500,682,185	2,980,832,112	353,654,732
Raw materials and energy production	97	356	283,417,594	300,251,790	110,282,162	32,619,651
Goods production	507	2,086	1,379,151,897	1,621,423,345	1,318,882,571	141,417,872
Distribution and transportation of goods	308	869	415,877,413	476,443,399	706,004,976	42,903,579
Information	67	236	153,684,612	263,476,630	66,425,947	6,226,141
Finance, insurance, real estate, and rental and leasing	385	1,856	3,112,659,865	3,834,116,468	318,224,097	57,066,692
Services	634	2,097	1,634,717,095	2,004,970,553	461,012,359	73,420,797
Industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Net income (less deficit)	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Dividends paid to controlling U.S. corporation	Total Subpart F income
	(7)	(8)	(9)	(10)	(11)	(12)
All industries	313,734,337	313,129,621	54,388,141	258,741,480	37,332,477	40,394,360
Raw materials and energy production	22,124,651	33,293,068	9,405,697	23,887,372	8,106,735	758,816
Goods production	122,828,136	106,539,184	16,828,485	89,710,698	14,313,788	10,325,669
Distribution and transportation of goods	35,527,066	39,382,536	7,713,349	31,669,187	2,411,509	6,955,389
Information	4,735,246	6,540,116	1,591,412	4,948,704	3,607,935	421,504
Finance, insurance, real estate, and rental and leasing	47,343,462	53,142,117	9,231,256	43,910,861	2,371,365	12,411,667
Services	81,175,776	74,232,601	9,617,942	64,614,659	6,521,146	9,521,314

[1] Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one industrial sector. The industrial activity of the parent corporation filing the return often differs from that of the Controlled Foreign Corporations.

percent, respectively. For Tax Year 2002, the information sector was the only sector with an aggregate deficit in E&P before income taxes (\$4.1 billion). For Tax Year 2004, this sector reported \$6.5 billion of E&P (less deficit) before income taxes.

For Tax Year 2004, 54.2 percent of the largest 7,500 CFCs were incorporated in Europe (see Figure E). European CFCs accounted for 63.3 percent of total assets and 56.4 percent of total receipts of the largest 7,500 CFCs. These CFCs earned 51.1 percent of E&P (less deficit) before income taxes and paid 48.0 percent of foreign taxes for the largest 7,500 CFCs. Approximately, 92.9 percent of these European CFCs were incorporated in European Union countries.⁸ Other Western Hemisphere and Asia were two other regions of significant activity, accounting

for 19.0 percent and 11.6 percent of the largest 7,500 CFCs for Tax Year 2004.

The largest 7,500 CFCs accounted for 92.2 percent of ending assets, 78.5 percent of total receipts, and 86.5 percent of E&P (less deficit) before income taxes of all CFCs controlled by U.S. parent corporations. The largest 7,500 CFCs paid 78.5 percent of foreign income taxes attributable to all CFCs. These largest CFCs remitted 80.0 percent of foreign taxable dividends paid to controlling U.S. shareholders and generated 84.5 percent of total subpart F income reported by these U.S. shareholders. Figure F shows the industrial and geographic composition for all CFCs and the largest 7,500 CFCs for Tax Year 2004. As Figure F shows, the largest 7,500 CFCs accurately reflect the industrial and geographic composition

⁸ Based on unpublished data.

Controlled Foreign Corporations, 2004

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Figure E

U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Net Income, Earnings, Taxes, Dividends, and Subpart F Income, by Geographic Region of Incorporation of Controlled Foreign Corporation, Tax Year 2004

[Money amounts are in thousands of dollars]

Geographic region of incorporation of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations				
		Number of foreign corporations	Total assets		Total receipts	Net income (less deficit) before income taxes
			Beginning-of-year	End-of-year		
	(1)	(2)	(3)	(4)	(5)	(6)
All geographic regions	1,135	7,500	6,979,508,476	8,500,682,185	2,980,832,112	353,654,732
Latin America	223	660	308,822,943	363,726,266	189,285,962	21,414,543
Other Western Hemisphere	571	1,422	1,439,513,081	1,688,102,041	588,225,064	79,964,308
Europe	792	4,064	4,379,055,538	5,383,455,930	1,681,081,503	201,779,814
Africa	44	74	20,676,547	23,674,901	15,716,356	1,616,450
Asia	264	869	605,903,525	753,039,347	415,463,889	37,263,580
Oceania	134	373	205,775,010	270,595,620	80,461,566	9,928,700
Puerto Rico and U.S. Possessions	27	38	19,761,832	18,088,079	10,597,773	1,687,336

Geographic region of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Net income (less deficit)	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Dividends paid to controlling U.S. corporation	Total Subpart F income
	(7)	(8)	(9)	(10)	(11)	(12)
All geographic regions	313,734,337	313,129,621	54,388,141	258,741,480	37,332,477	40,394,360
Latin America	17,015,430	18,345,968	4,180,562	14,165,407	1,922,479	648,480
Other Western Hemisphere	66,210,516	81,680,392	13,660,286	68,020,106	15,356,921	11,871,449
Europe	191,191,862	160,011,693	26,108,144	133,903,549	15,268,934	23,128,482
Africa	1,122,703	1,705,438	490,438	1,215,000	302,105	119,839
Asia	28,630,476	38,207,225	7,861,460	30,345,765	3,293,628	3,714,994
Oceania	8,102,410	11,305,240	1,948,484	9,356,755	991,592	783,954
Puerto Rico and U.S. Possessions	1,460,940	1,873,665	138,767	1,734,898	196,818	127,162

[1] Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one geographical region.

of the population of all CFCs at the industrial sector and major geographic region levels.⁹

Data Sources and Limitations

The statistics presented in this article are based on information collected from corporate tax returns (Form(s) 1120) with accounting periods ending July 2004 through June 2005 and their attached Form(s) 5471, *Information Return of U.S. Persons With Respect to Certain Foreign Corporations*. A U.S. corporation is required by Internal Revenue Service regulations to submit a Form 5471 for any Controlled Foreign Corporation (CFC) with an accounting peri-

od ending with or within the U.S. parent's accounting period. Thus, the accounting periods for Tax Year 2004 CFCs may have ended as early as July 2003 and as late as June 2005. However, most CFC activity occurred in Calendar Year 2004. These statistics report data for active foreign corporations controlled by U.S. corporations (see Active versus inactive Controlled Foreign Corporations in the Explanation of Selected Terms section of this article).

Coefficient of variation (CV) tables are not provided because these data are not subject to significant sampling error. For example, CFCs sampled at a 100-percent rate accounted for more than 95.0 per-

⁹ While the largest 7,500 CFCs accurately depict the industrial and geographic composition of all CFCs, the new study design allows SOI to publish more detailed data at the industry and country levels, as well as provide population estimates for CFC data. In prior CFC studies, SOI did not publish statistics for many industries and countries due to the disclosure problems associated with having data for only 7,500 CFCs.

Figure F

Percentage of the Number, Assets, Receipts, Earnings, and Taxes of All Controlled Foreign Corporations and the 7,500 Largest Controlled Foreign Corporations, by Industrial Sector and Geographic Region of Incorporation of Controlled Foreign Corporation, Tax Year 2004

Industrial sector of Controlled Foreign Corporation	Number of CFCs		End-of-year assets		Total receipts		Current E&P (less deficit) before income taxes		Income taxes	
	All CFCs	7,500	All CFCs	7,500	All CFCs	7,500	All CFCs	7,500	All CFCs	7,500
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
All industries [1]	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Raw materials and energy production	3.7	4.7	3.5	3.5	3.4	3.7	9.2	10.6	14.5	17.3
Goods production	25.9	27.8	20.2	19.1	43.0	44.2	34.6	34.0	32.2	30.9
Distribution and transportation of goods	21.7	11.6	6.7	5.6	25.5	23.7	14.5	12.6	16.8	14.2
Information	5.0	3.1	3.1	3.1	2.5	2.2	2.2	2.1	3.2	2.9
Finance, insurance, real estate, and rental and leasing	11.7	24.7	42.5	45.1	9.4	10.7	16.0	17.0	15.1	17.0
Services	31.4	28.0	23.8	23.6	16.2	15.5	23.6	23.7	18.1	17.7

Geographic area of incorporation of Controlled Foreign Corporation	Number of CFCs		End-of-year assets		Total receipts		Current E&P (less deficit) before income taxes		Income taxes	
	All CFCs	7,500	All CFCs	7,500	All CFCs	7,500	All CFCs	7,500	All CFCs	7,500
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
All geographic regions [2]	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Latin America	14.3	8.8	4.9	4.3	7.6	6.4	6.8	5.9	9.2	7.7
Other Western Hemisphere	13.8	19.0	19.5	19.9	18.4	19.7	24.0	26.1	22.7	25.1
Europe	45.2	54.2	62.2	63.3	54.3	56.4	49.8	51.1	46.9	48.0
Africa	2.0	1.0	0.4	0.3	0.8	0.5	0.8	0.5	1.3	0.9
Asia	19.2	11.6	9.5	8.9	15.1	13.9	13.6	12.2	15.7	14.5
Oceania	4.8	5.0	3.3	3.2	3.1	2.7	4.0	3.6	4.0	3.6
Puerto Rico and U.S. Possessions	0.7	0.5	0.3	0.2	0.5	0.4	0.9	0.6	0.4	0.3

[1] Includes "Nature of business not allocable," not shown separately.

[2] Includes "Other country or country unknown," not shown separately.

NOTE: Detail may not add to 100 percent because of rounding.

cent of the number of CFCs and more than 99.9 percent of the total ending assets for all CFCs.¹⁰ However, these data may be subject to nonsampling error.

Several limitations apply when making comparisons to prior-year statistics. First, the data in this article are based on a sample of U.S. corporations. For Tax Year 2004, this sample includes all CFCs controlled by U.S. corporations with \$10 million or more in total assets or \$2.5 million or more in "proceeds" and all CFCs filed by U.S. corporations with less than \$10 million in the SOI corporate sample.¹¹ The sample for the Tax Year 2004 CFC statistics is far more inclusive than recent studies, which included only the 7,500 largest CFCs controlled by U.S. corporations with \$500 million or more in total assets.

Second, statistics previously published by Statistics of Income for tax years before 1986 were for all CFCs controlled by U.S. corporations with total assets of \$250 million or more, not just the 7,500 largest active CFCs controlled by U.S. corporations with total assets of \$500 million or more. Therefore, the statistics for these years include smaller and also inactive CFCs. For this reason, comparisons between statistics on the largest CFCs and statistics for years before 1986 should be made with caution.

Third, the composition of the 7,500 largest CFCs is not consistent across tax years. For example, only 84.3 percent of the 7,500 largest CFCs for Tax Year 2004 were also included in the 7,500 largest CFCs for Tax Year 2002. Many of the 7,500 largest CFCs

¹⁰ Based on unpublished data.

¹¹ See Statistics of Income, *Corporation Income Tax Returns, 2004* for a more complete description of the SOI Corporate sample. The SOI Corporate sample is the basis for the SOI Controlled Foreign Corporation sample. In other words, the Controlled Foreign Corporation sample includes every Form 5471 filed by each corporation in the SOI Corporate sample.

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for Tax Year 2002 that were not included among the 7,500 largest CFCs for Tax Year 2004 were still controlled by U.S. corporations, but the size of their total assets for Tax Year 2004 excluded them from this group. In addition, some of the 7,500 largest CFCs for Tax Year 2002 were not included in Tax Year 2002 because they were no longer “controlled” or the U.S. parent corporation’s total assets had fallen below \$500 million.

Finally, fluctuations in exchange rates can have significant effects on the reported statistics. Financial statistics that are translated using current (as opposed to historical) rates of exchange can be distorted by large exchange rate fluctuations. The weakening of the U.S. dollar against many currencies from Tax Year 2002 to Tax Year 2004 certainly contributed to the large increases in some of the statistics presented in this article.

Caution should also be used when comparing data by industrial groupings. For Tax Years 1998, 2000, 2002, and 2004, CFCs were classified under the North American Industry Classification System (NAICS), which differs from the Standard Industrial Classification (SIC) system used before Tax Year 1998. While most industries were not affected by the implementation of NAICS, the groupings of some economic activities were changed. The most significant change was the movement of the management of companies and enterprises sector from finance, insurance, and real estate under the SIC system to the services sector under NAICS. Furthermore, CFCs were classified by industry based on their principal business activity as reported on Form 5471. However, assets, receipts, and profits may have also been related to secondary business activities. It is not possible to measure the extent of these secondary business activities due to these activities not being detailed on Form 5471.

Explanation of Selected Terms

Active versus inactive Controlled Foreign Corporations—In general, a foreign corporation was considered active if earnings and profits, income taxes, receipts, expenses, distributions of E&P, or certain transactions between the foreign corporation and its subsidiaries or majority shareholder were reported on Form 5471, *Information Return of U.S. Persons With Respect to Certain Foreign Corporations*. The filing of Form 5471 was required even if a CFC was dormant or inactive for Tax Year 2004. Only data

from active CFCs are included in the statistics in this article, unless otherwise noted.

Average tax rate—For purposes of this article, the average tax rate is defined as income tax divided by E&P (less deficit) before income taxes.

Controlled Foreign Corporation—Section 957 of the Internal Revenue Code defines a foreign corporation as being controlled if more than 50 percent of the total combined voting power of all classes of stock of such corporation entitled to vote, 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. A U.S. shareholder for purposes of determining control is defined as a U.S. person (see definition below) owning 10 percent or more of the foreign corporation’s voting stock. For purposes of these statistics, a foreign corporation was controlled only if a single U.S. corporation satisfied the ownership requirements for an uninterrupted period of at least 30 days. These are the only foreign corporations for which complete Form 5471 filings are required. U.S. corporations may also control a CFC through a partnership where the U.S. corporation is the controlling partner. To the extent possible, these CFCs have also been included in these statistics.

Country of incorporation—The country of incorporation is the country under whose laws the CFC is legally created. The CFC’s country of incorporation is not necessarily the principal place of business. For Tax Year 2004, 1,728 CFCs (2.3 percent) reported a principal place of business that differed from the reported country of incorporation. Tables 2 and 3 provide data by country of incorporation; data by principal place of business are not included in these statistics.

Current earnings and profits—Current earnings and profits represent the difference between total earnings and profits of the foreign corporation at the end of the current year (before reduction by dividends paid during the year) and the accumulated earnings and profits of the corporation at the beginning of the year. Although current earnings and profits typically are an after-tax measure of profits, they are shown in these statistics both before and after taxes. Earnings and profits are a tax concept referring to the economic capacity of a corporation to make a distribution to shareholders that is not a return on capital. The term “earnings and profits” is not specifically defined in the Internal Revenue

Code. In those instances where current earnings and profits were not reported for the foreign corporation, net income per books was used in place of missing earnings and profits.

Distributions out of earnings and profits—A distribution comes first from current earnings and profits and then from accumulated earnings and profits.

Income taxes—CFCs reported income, war profits, and excess profits taxes paid or accrued to any foreign country or U.S. Possession as income tax for their annual accounting periods.

OPEC countries—The member countries of the Organization of Petroleum Exporting Countries for Tax Year 2004 were: Algeria, Indonesia, Iran, Iraq, Kuwait, Libya, Nigeria, Qatar, Saudi Arabia, United Arab Emirates, and Venezuela.

Previously taxed earnings and profits—This includes any earnings and profit amounts that were subject to U.S. tax in the current year or in a prior year, but not distributed. Previously taxed earnings and profits include amounts related to Subpart F income (see definition below), earnings related to investments in certain U.S. property, previously excluded Subpart F income withdrawn from qualified investments, previously excluded export trade income withdrawn from investment in export trade assets, factoring income, and earnings invested in excess passive assets.

Subpart F income—Internal Revenue Code sections 951 and 952 stipulate specific cases in which earnings and profits are deemed to have been paid by a CFC to a U.S. shareholder. Such income is subject to U.S. tax whether or not it is repatriated to U.S. shareholders in the form of an actual dividend.

Internal Revenue Code section 951 requires that U.S. shareholders include in their gross incomes certain undistributed profits of foreign corporations controlled by U.S. shareholders. Subpart F income from a CFC includes certain insurance income of U.S. risks, “foreign base company” income, international boycott participation income, bribes and other illegal payments to foreign government officials, and income from any country which the United States does not recognize or with which it has severed relations, or which repeatedly provides support for acts of international terrorism.

Total assets—For purposes of determining the 7,500 largest CFCs for these statistics, total assets are defined as the larger of the foreign corporation’s beginning-of-year and end-of-year total assets. However, the statistics cited in this article generally refer to ending assets unless otherwise noted.

Total receipts—Total receipts equal business receipts (gross receipts from sales and operations) plus income from investment activity. In the statistics reported prior to 1990, “business receipts” were used to describe the larger of “gross receipts from sales and operations” and “total income.” The latter is a tax return concept used to describe the sum of business receipts less cost of sales and operations (i.e., gross profit), plus income (less loss) from investments.

U.S. person—A U.S. person can be a U.S. citizen or resident individual, a domestic partnership, a domestic corporation, or an estate or trust (other than a foreign estate or trust whose income from sources outside the United States is not includable in the beneficiaries’ gross income).

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning-of-year	End-of-year	
	(1)	(2)	(3)	(4)	(5)
All industries	10,939	74,676	7,613,683,688	9,217,097,520	3,795,850,571
Raw materials and energy production	574	2,744	308,810,919	326,367,994	127,239,949
Agriculture, forestry, and fishing	132	466	17,825,665	19,001,172	8,568,980
Mining	316	1,766	217,596,505	231,881,871	81,962,670
Oil and gas extraction	198	1,212	182,391,018	193,358,065	64,704,216
Mining (except oil and gas)	59	287	21,808,569	26,517,202	10,801,058
Support activities for mining	90	267	13,396,919	12,006,604	6,457,396
Utilities	155	511	73,388,749	75,484,951	36,708,299
Goods production	3,912	19,359	1,596,395,081	1,865,827,173	1,633,118,266
Construction	149	675	14,867,521	16,401,113	19,078,357
Construction of buildings	39	87	2,361,105	2,800,144	2,879,061
Heavy and civil engineering construction	45	111	1,179,045	1,327,807	1,371,193
Specialty trade contractors	76	476	11,327,370	12,273,162	14,828,102
Manufacturing	3,813	18,684	1,581,527,560	1,849,426,060	1,614,039,909
Food manufacturing	161	936	86,610,351	96,855,689	99,299,567
Beverage and tobacco product manufacturing	37	282	67,712,546	79,728,563	81,959,206
Beverage manufacturing	29	225	47,710,719	57,033,110	42,233,593
Tobacco manufacturing	9	57	20,001,826	22,695,453	39,725,612
Textile mills and textile product mills	58	136	5,734,829	5,857,783	4,564,718
Apparel manufacturing	122	416	9,284,167	9,348,293	12,504,992
Leather and allied product manufacturing	38	66	943,217	1,059,102	2,178,588
Wood product manufacturing	42	123	3,869,904	4,280,675	4,726,391
Paper manufacturing	182	729	60,040,708	71,599,496	41,049,598
Petroleum and coal products manufacturing	36	162	57,496,213	59,024,665	115,349,158
Chemical manufacturing	426	3,150	501,461,086	606,413,237	294,207,268
Basic chemical manufacturing	76	710	43,311,185	50,585,684	36,693,822
Pharmaceutical and medicine manufacturing	103	462	257,920,989	340,830,658	156,271,797
Soap, cleaning compound, and toilet preparation manufacturing	39	449	26,024,534	31,937,421	25,675,375
Other chemical manufacturing	270	1,529	174,204,378	183,059,473	75,566,273
Plastics and rubber products manufacturing	293	870	60,373,311	68,922,882	40,801,198
Nonmetallic mineral product manufacturing	96	320	27,388,944	39,250,042	18,965,226
Primary metal manufacturing	108	241	19,761,713	23,408,009	20,038,998
Fabricated metal product manufacturing	404	1,391	35,415,874	39,107,629	37,732,016
Machinery manufacturing	402	1,543	45,414,614	54,531,951	60,213,887
Computer and electronic product manufacturing	699	2,325	173,685,831	219,571,997	243,939,798
Communications equipment manufacturing	134	631	30,971,829	38,269,072	50,304,458
Semiconductor and other electronic component manufacturing	259	884	57,400,354	63,166,178	78,815,862
Other computer and electronic manufacturing	341	809	85,313,648	118,136,746	114,819,478
Electric equipment, appliance, and component manufacturing	478	1,618	57,897,341	62,323,245	65,334,991
Transportation equipment manufacturing	245	1,460	235,558,143	261,095,685	343,430,309
Motor vehicles and parts manufacturing	164	1,158	214,151,520	243,446,592	330,517,949
Other transportation equipment manufacturing	103	302	21,406,623	17,649,093	12,912,360
Furniture and related product manufacturing	48	150	3,166,327	3,419,820	3,601,417
Miscellaneous manufacturing	831	2,764	129,712,442	143,627,295	124,142,585
Medical and equipment supplies manufacturing	207	797	47,692,734	51,580,324	51,632,585
Other miscellaneous manufacturing	645	1,968	82,019,707	92,046,971	72,510,000
Distribution and transportation of goods	3,348	16,215	540,946,198	620,621,547	966,617,230
Wholesale and retail trade	3,134	14,671	510,082,149	586,224,562	928,941,783
Wholesale trade	2,397	12,461	384,856,205	439,298,527	670,099,617
Motor vehicle and motor vehicle parts and supplies wholesalers	110	439	16,249,462	17,049,510	33,635,059
Professional and commercial equipment and supplies wholesalers	97	393	7,476,149	10,209,718	9,498,981
Electrical and electronic goods wholesalers	311	1,441	28,429,868	36,786,814	60,822,703
Machinery, equipment, and suppliers wholesalers	352	1,580	32,404,960	39,699,919	42,984,479

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning-of-year	End-of-year	
	(1)	(2)	(3)	(4)	(5)
Drugs and druggists' sundries wholesalers	77	726	54,101,061	65,348,807	58,782,720
Apparel, piece goods, and notions wholesalers	122	375	7,140,170	8,412,540	9,635,183
Grocery and related product wholesalers	81	360	9,301,716	10,025,528	20,174,915
Chemical and allied products wholesalers	166	842	20,254,055	22,840,846	30,918,483
Petroleum and petroleum products wholesalers	41	358	72,066,069	80,207,355	157,337,049
Other wholesale trade	1,348	5,948	137,432,695	148,717,490	246,310,047
Retail trade	880	2,196	125,104,604	146,794,815	258,557,958
Motor vehicle dealers and parts dealers	41	181	6,368,660	7,760,681	20,038,218
Electronics and appliance stores	132	247	3,907,600	4,868,022	8,246,386
Building materials and garden equipment and suppliers dealers	25	74	3,218,596	4,728,042	5,388,728
Food and beverage stores	29	45	3,803,120	4,446,309	12,004,815
Health and personal care stores	277	331	4,189,073	4,243,487	3,806,153
Clothing and clothing accessories stores	50	149	5,021,571	5,242,857	9,841,109
General merchandise stores	21	82	43,466,356	51,524,520	84,489,591
Electronic shopping and mail-order houses	50	139	2,182,675	2,647,772	2,319,859
Other retailers	291	947	52,946,952	61,333,125	112,423,100
Wholesale and retail trade not allocable	11	13	121,340	131,220	284,208
Transportation and warehousing	327	1,544	30,864,049	34,396,985	37,675,447
Air transportation	26	137	2,334,619	2,823,566	3,345,236
Water transportation	66	267	9,719,115	10,531,691	6,800,469
Truck transportation	46	188	1,851,579	2,640,856	3,729,748
Support activities for transportation	126	565	9,168,556	10,389,880	16,094,284
Other transportation	44	188	5,957,788	5,797,708	5,462,247
Warehousing and storage	101	199	1,832,392	2,213,283	2,243,463
Information	743	3,740	176,746,514	289,705,068	95,170,491
Publishing industries	202	965	29,890,548	41,458,870	24,196,690
Newspaper, periodical, book and directory publishers	91	605	16,455,322	18,567,159	10,282,763
Software publishers	113	361	13,435,226	22,891,711	13,913,926
Motion picture and sound recording industries	51	729	22,510,608	87,496,530	22,711,463
Broadcasting (except Internet)	40	324	18,042,179	19,868,288	8,520,648
Internet publishing and broadcasting	7	15	26,358	44,836	106,435
Telecommunications	183	826	96,887,677	125,854,520	29,876,528
Internet service providers, Web search portals, and data processing services	188	403	5,063,019	8,810,756	4,987,803
Other information services	153	476	4,326,125	6,171,268	4,770,923
Finance, insurance, real estate, and rental and leasing	1,664	8,743	3,189,714,638	3,919,933,672	356,043,531
Finance and insurance	1,166	6,553	3,098,144,998	3,814,233,269	332,614,003
Credit intermediation and related activities	282	1,301	769,668,522	947,197,513	71,175,766
Depository credit intermediation	42	162	262,255,267	350,570,255	21,104,785
Nondepository credit intermediation	210	931	462,477,245	546,680,197	45,584,160
Activities related to credit intermediation	76	208	44,936,010	49,947,061	4,486,820
Securities, commodity contracts, and other financial investments and related products	614	2,724	1,620,065,500	1,999,193,785	134,418,148
Insurance carriers and related activities	456	1,891	395,195,323	470,225,006	98,474,315
Insurance carriers	185	468	273,507,721	329,084,068	68,604,725
Agencies, brokerages, and other insurance related activities	344	1,423	121,687,602	141,140,938	29,869,591
Funds, trusts, and other financial activities	174	636	313,215,653	397,616,965	28,545,774
Real estate and rental and leasing	724	2,190	91,569,640	105,700,403	23,429,529
Rental and leasing services	173	526	50,732,530	57,502,791	13,015,964
Commercial and industrial machinery and equipment rental and leasing	139	383	36,270,321	42,485,602	5,456,238
Other rental and leasing services	41	143	14,462,208	15,017,188	7,559,726
Other real estate and rental and leasing	592	1,664	40,837,111	48,197,612	10,413,565

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning-of-year	End-of-year	
	(1)	(2)	(3)	(4)	(5)
Services	4,693	23,418	1,799,886,561	2,193,185,896	616,353,220
Professional, scientific, and technical services	3,085	13,473	252,903,009	298,054,649	262,157,131
Architectural, engineering, and related services	231	769	8,324,713	9,221,079	10,729,183
Computer system design and related services	1,395	4,776	112,717,684	131,546,081	111,649,649
Custom computer programming services	281	521	1,246,137	2,150,881	2,026,579
Computer systems design services	165	603	8,635,394	11,912,588	8,265,860
Other computer system design and related services	1,008	3,653	102,836,153	117,482,613	101,357,211
Management, scientific, and technical consulting services	330	1,021	18,762,157	17,619,659	12,261,360
Scientific research and development services	406	698	9,388,783	11,044,029	4,235,699
Advertising and related services	175	2,530	42,248,570	48,256,390	42,982,333
Other professional, scientific, and technical services	1,016	3,678	61,461,103	80,367,411	80,298,907
Management of companies and enterprises	1,744	5,965	1,436,662,341	1,774,470,144	273,299,270
Administration and support and waste management and remediation services	566	1,714	39,319,851	41,489,008	33,211,070
Educational services	37	205	2,577,385	3,274,421	1,733,426
Health care and social assistance	66	299	4,312,838	5,185,507	2,914,929
Arts, entertainment, and recreation	103	405	11,824,252	12,118,074	6,092,568
Accommodation and food services	85	678	36,174,591	38,879,837	25,129,124
Other services (except public administration)	205	678	16,112,294	19,714,256	11,815,704
Nature of business not allocable	218	458	1,183,778	1,456,172	1,307,883

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
All industries	362,199,144	69,252,227	292,946,918	432,572,981	67,997,857	364,575,123
Raw materials and energy production	33,177,301	10,066,054	23,111,247	38,092,670	9,955,655	28,137,015
Agriculture, forestry, and fishing	725,729	93,365	632,365	879,878	90,770	789,108
Mining	27,556,673	9,342,615	18,214,058	31,873,585	9,193,351	22,680,234
Oil and gas extraction	25,045,402	8,871,467	16,173,934	28,161,716	8,747,103	19,414,613
Mining (except oil and gas)	1,937,918	308,223	1,629,695	2,965,918	301,411	2,664,507
Support activities for mining	573,353	162,924	410,429	745,951	144,836	601,114
Utilities	4,894,898	630,075	4,264,823	5,339,207	671,534	4,667,673
Goods production	125,146,203	22,297,868	102,848,335	145,962,799	22,179,827	123,782,973
Construction	1,303,105	358,240	944,865	1,797,692	356,973	1,440,719
Construction of buildings	187,949	57,635	130,315	267,816	55,082	212,734
Heavy and civil engineering construction	13,857	13,146	711	102,383	13,495	88,888
Specialty trade contractors	1,101,298	287,459	813,839	1,427,493	288,396	1,139,097
Manufacturing	123,843,098	21,939,628	101,903,470	144,165,107	21,822,853	122,342,253
Food manufacturing	6,562,527	1,502,805	5,059,722	7,357,908	1,464,599	5,893,310
Beverage and tobacco product manufacturing	12,176,581	1,880,036	10,296,545	12,744,581	1,831,093	10,913,489
Beverage manufacturing	7,576,267	1,013,334	6,562,933	8,038,110	964,023	7,074,087
Tobacco manufacturing	4,600,315	866,702	3,733,613	4,706,471	867,070	3,839,402
Textile mills and textile product mills	221,500	55,708	165,792	315,066	57,583	257,483
Apparel manufacturing	742,879	111,504	631,376	1,047,059	114,959	932,100
Leather and allied product manufacturing	129,296	32,942	96,354	145,557	33,000	112,556
Wood product manufacturing	495,672	152,884	342,789	560,021	153,156	406,865
Paper manufacturing	2,491,031	632,819	1,858,212	3,336,848	631,051	2,705,797
Petroleum and coal products manufacturing	8,148,989	2,236,064	5,912,925	8,415,002	2,234,193	6,180,809
Chemical manufacturing	40,880,273	5,322,827	35,557,446	43,549,730	5,358,645	38,191,085
Basic chemical manufacturing	4,150,610	803,338	3,347,272	4,774,481	750,920	4,023,561
Pharmaceutical and medicine manufacturing	28,109,898	2,493,374	25,616,524	29,029,752	2,540,231	26,489,521
Soap, cleaning compound, and toilet preparation manufacturing	3,089,930	845,022	2,244,909	3,192,580	839,830	2,352,750
Other chemical manufacturing	5,529,834	1,181,093	4,348,741	6,552,917	1,227,664	5,325,254
Plastics and rubber products manufacturing	2,673,724	735,765	1,937,959	3,225,827	734,415	2,491,412
Nonmetallic mineral product manufacturing	3,426,841	488,420	2,938,421	3,635,794	476,464	3,159,330
Primary metal manufacturing	2,682,781	462,149	2,220,632	2,887,822	461,522	2,426,300
Fabricated metal product manufacturing	2,731,502	649,377	2,082,125	3,147,847	643,949	2,503,898
Machinery manufacturing	3,413,202	926,423	2,486,779	4,478,616	921,400	3,557,217
Computer and electronic product manufacturing	16,941,192	1,966,888	14,974,304	19,786,673	1,915,872	17,870,801
Communications equipment manufacturing	2,490,632	411,157	2,079,475	3,310,980	394,043	2,916,937
Semiconductor and other electronic component manufacturing	5,091,953	696,720	4,395,234	6,336,461	676,407	5,660,053
Other computer and electronic manufacturing	9,358,606	859,011	8,499,595	10,139,233	845,421	9,293,811
Electric equipment, appliance, and component manufacturing	4,807,806	807,120	4,000,686	5,616,302	778,785	4,837,517
Transportation equipment manufacturing	6,661,327	1,685,256	4,976,071	12,874,609	1,832,821	11,041,788
Motor vehicles and parts manufacturing	4,922,236	1,515,825	3,406,411	10,754,128	1,682,326	9,071,802
Other transportation equipment manufacturing	1,739,091	169,431	1,569,660	2,120,481	150,495	1,969,987
Furniture and related product manufacturing	72,093	28,530	43,563	175,804	27,388	148,416
Miscellaneous manufacturing	8,583,883	2,262,111	6,321,772	10,864,039	2,151,960	8,712,079
Medical and equipment supplies manufacturing	3,703,132	783,107	2,920,025	4,609,962	693,836	3,916,126
Other miscellaneous manufacturing	4,880,751	1,479,004	3,401,747	6,254,077	1,458,124	4,795,953
Distribution and transportation of goods	52,504,462	11,643,824	40,860,638	58,826,488	11,454,019	47,372,469
Wholesale and retail trade	49,583,839	11,215,390	38,368,449	55,258,912	11,026,900	44,232,012
Wholesale trade	37,916,811	7,477,862	30,438,949	41,996,815	7,314,197	34,682,619
Motor vehicle and motor vehicle parts and supplies wholesalers	662,842	248,099	414,743	1,056,330	208,813	847,517
Professional and commercial equipment and supplies wholesalers	1,802,035	172,413	1,629,623	1,867,883	169,351	1,698,532
Electrical and electronic goods wholesalers	2,435,048	562,571	1,872,477	2,839,901	551,497	2,288,404
Machinery, equipment, and suppliers wholesalers	3,312,332	511,206	2,801,126	3,581,384	507,954	3,073,429

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
Drugs and druggists' sundries wholesalers	5,912,907	1,217,375	4,695,533	6,431,905	1,149,432	5,282,473
Apparel, piece goods, and notions wholesalers	604,425	139,021	465,404	762,479	135,664	626,815
Grocery and related product wholesalers	930,740	172,726	758,014	1,117,642	169,589	948,053
Chemical and allied products wholesalers	1,682,421	418,699	1,263,722	1,881,436	410,048	1,471,388
Petroleum and petroleum products wholesalers	5,741,597	303,359	5,438,239	5,993,096	289,203	5,703,893
Other wholesale trade	14,832,463	3,732,395	11,100,068	16,464,760	3,722,646	12,742,114
Retail trade	11,650,146	3,731,932	7,918,213	13,244,834	3,707,210	9,537,623
Motor vehicle dealers and parts dealers	304,148	89,919	214,229	395,029	88,915	306,114
Electronics and appliance stores	159,586	87,845	71,741	354,755	95,097	259,658
Building materials and garden equipment and suppliers dealers	387,341	134,822	252,519	415,950	135,667	280,283
Food and beverage stores	387,699	82,936	304,763	414,078	84,117	329,961
Health and personal care stores	394,000	82,497	311,503	421,736	81,982	339,754
Clothing and clothing accessories stores	894,159	238,379	655,781	967,543	243,642	723,900
General merchandise stores	1,706,857	769,125	937,732	2,325,981	765,729	1,560,252
Electronic shopping and mail-order houses	131,192	52,550	78,642	232,974	52,273	180,701
Other retailers	7,285,163	2,193,861	5,091,303	7,716,789	2,159,788	5,557,001
Wholesale and retail trade not allocable	16,882	* 5,596	11,287	* 17,262	* 5,493	* 11,770
Transportation and warehousing	2,920,623	428,434	2,492,189	3,567,577	427,119	3,140,458
Air transportation	150,918	30,020	120,898	182,815	30,060	152,754
Water transportation	1,265,633	64,052	1,201,580	1,441,010	69,241	1,371,769
Truck transportation	68,905	38,050	30,855	164,821	35,228	129,593
Support activities for transportation	929,570	174,666	754,904	1,022,968	173,119	849,850
Other transportation	375,143	88,282	286,860	576,241	90,592	485,649
Warehousing and storage	130,454	33,363	97,090	179,722	28,879	150,843
Information	8,073,622	2,249,857	5,823,765	12,847,072	2,133,474	10,713,598
Publishing industries	4,350,921	860,150	3,490,771	4,770,967	860,181	3,910,787
Newspaper, periodical, book and directory publishers	1,382,076	454,177	927,899	1,497,357	451,127	1,046,230
Software publishers	2,968,845	405,974	2,562,872	3,273,610	409,054	2,864,556
Motion picture and sound recording industries	1,861,241	529,000	1,332,241	2,389,116	515,078	1,874,038
Broadcasting (except Internet)	613,154	75,540	537,614	1,536,552	81,846	1,454,707
Internet publishing and broadcasting	3,507	* 1	3,506	4,139	* 1	4,138
Telecommunications	308,754	474,398	-165,644	2,803,793	363,730	2,440,063
Internet service providers, Web search portals, and data processing services	401,656	161,870	239,786	690,150	158,533	531,616
Other information services	534,389	148,897	385,492	652,356	154,106	498,250
Finance, insurance, real estate, and rental and leasing	57,870,006	10,466,173	47,403,834	71,341,733	10,020,332	61,321,401
Finance and insurance	54,283,443	9,630,755	44,652,688	65,623,136	9,215,587	56,407,549
Credit intermediation and related activities	15,322,487	2,885,988	12,436,499	18,412,537	2,768,286	15,644,251
Depository credit intermediation	4,765,030	1,082,205	3,682,825	4,927,099	1,045,345	3,881,753
Nondepository credit intermediation	9,708,306	1,639,898	8,068,408	12,432,264	1,581,327	10,850,937
Activities related to credit intermediation	849,151	163,885	685,266	1,053,174	141,613	911,561
Securities, commodity contracts, and other financial investments and related products	19,366,610	3,319,300	16,047,310	22,656,569	3,180,184	19,476,386
Insurance carriers and related activities	13,779,479	2,597,167	11,182,312	16,114,294	2,493,431	13,620,863
Insurance carriers	9,309,312	1,561,265	7,748,046	10,613,800	1,499,843	9,113,957
Agencies, brokerages, and other insurance related activities	4,470,167	1,035,902	3,434,265	5,500,493	993,588	4,506,905
Funds, trusts, and other financial activities	5,814,867	828,300	4,986,567	8,439,737	773,687	7,666,050
Real estate and rental and leasing	3,586,563	835,418	2,751,146	5,718,596	804,744	4,913,852
Rental and leasing services	2,184,110	313,809	1,870,301	3,612,290	303,249	3,309,041
Commercial and industrial machinery and equipment rental and leasing	2,011,163	204,443	1,806,720	3,141,678	195,690	2,945,988
Other rental and leasing services	172,947	109,366	63,581	470,612	107,559	363,053
Other real estate and rental and leasing	1,402,454	521,609	880,845	2,106,307	501,496	1,604,811

Footnotes at end of table.

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
Services	85,462,899	12,510,316	72,952,583	105,385,304	12,234,108	93,151,196
Professional, scientific, and technical services	21,611,410	4,616,298	16,995,112	27,438,997	4,514,556	22,924,441
Architectural, engineering, and related services	550,949	124,505	426,444	789,742	118,581	671,161
Computer system design and related services	12,916,459	2,516,635	10,399,824	15,371,891	2,492,363	12,879,528
Custom computer programming services	163,892	42,587	121,305	254,897	41,115	213,782
Computer systems design services	437,756	123,696	314,060	830,598	120,412	710,186
Other computer system design and related services	12,314,811	2,350,352	9,964,459	14,286,395	2,330,835	11,955,560
Management, scientific, and technical consulting services	1,079,600	215,991	863,609	1,443,692	204,937	1,238,755
Scientific research and development services	196,648	47,599	149,049	662,997	45,222	617,775
Advertising and related services	1,812,426	569,399	1,243,027	2,694,178	540,789	2,153,390
Other professional, scientific, and technical services	5,055,328	1,142,168	3,913,160	6,476,497	1,112,665	5,363,832
Management of companies and enterprises	59,388,762	6,630,893	52,757,869	71,865,251	6,503,151	65,362,100
Administration and support and waste management and remediation services	1,155,902	350,002	805,899	1,748,806	321,101	1,427,705
Educational services	273,399	37,784	235,615	357,186	30,560	326,625
Health care and social assistance	294,303	75,625	218,678	429,193	73,785	355,408
Arts, entertainment, and recreation	197,886	77,726	120,160	407,252	74,761	332,491
Accommodation and food services	1,492,814	486,589	1,006,225	1,922,138	482,153	1,439,985
Other services (except public administration)	1,048,423	235,398	813,025	1,216,482	234,041	982,440
Nature of business not allocable	-35,348	18,136	-53,484	116,914	20,443	96,471

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
	(12)	(13)	(14)	(15)	(16)
All industries	135,230,421	91,424,129	43,806,293	46,638,623	47,794,506
Raw materials and energy production	15,990,632	15,156,004	834,627	8,410,113	932,091
Agriculture, forestry, and fishing	408,147	135,377	* 272,770	19,012	180,532
Mining	13,399,910	12,953,615	446,295	8,360,012	661,604
Oil and gas extraction	12,624,788	12,238,401	386,388	8,029,068	593,602
Mining (except oil and gas)	605,299	552,630	* 52,669	270,678	35,651
Support activities for mining	169,822	162,585	* 7,238	60,265	32,351
Utilities	2,182,575	2,067,012	115,562	31,090	89,955
Goods production	43,338,323	31,700,160	11,638,163	17,604,019	11,898,152
Construction	518,383	461,385	56,998	87,647	91,389
Construction of buildings	* 26,431	* 24,929	* 1,502	* 18,538	* 393
Heavy and civil engineering construction	* 14,642	* 12,516	* 2,126	* 7,049	* 7,203
Specialty trade contractors	477,310	423,940	53,369	62,060	83,793
Manufacturing	42,819,940	31,238,775	11,581,166	17,516,373	11,806,763
Food manufacturing	3,170,812	2,624,196	546,616	1,048,032	586,910
Beverage and tobacco product manufacturing	4,006,222	1,864,795	2,141,426	643,082	2,279,010
Beverage manufacturing	1,245,743	1,189,052	56,691	630,578	667,005
Tobacco manufacturing	2,760,479	675,744	2,084,735	* 12,504	1,612,004
Textile mills and textile product mills	179,807	158,103	* 21,704	* 143,470	* 13,888
Apparel manufacturing	1,220,848	1,137,110	83,738	642,513	99,291
Leather and allied product manufacturing	* 48,690	* 35,097	* 13,594	* 15,946	* 8,399
Wood product manufacturing	211,684	207,536	* 4,148	* 80,460	* 10,471
Paper manufacturing	2,085,098	1,847,772	237,326	1,250,820	184,291
Petroleum and coal products manufacturing	5,316,950	4,628,937	688,013	3,094,966	731,171
Chemical manufacturing	9,269,840	6,222,778	3,047,062	3,956,916	2,436,905
Basic chemical manufacturing	929,845	797,260	132,585	387,712	265,270
Pharmaceutical and medicine manufacturing	4,209,669	2,552,883	1,656,787	1,940,985	1,389,397
Soap, cleaning compound, and toilet preparation manufacturing	1,240,729	1,032,157	208,572	749,253	229,426
Other chemical manufacturing	2,889,597	1,840,478	1,049,119	878,966	552,813
Plastics and rubber products manufacturing	799,096	632,251	166,845	302,856	177,546
Nonmetallic mineral product manufacturing	1,024,326	775,091	249,235	355,658	122,528
Primary metal manufacturing	557,404	413,641	* 143,763	172,928	181,757
Fabricated metal product manufacturing	1,061,228	942,642	118,586	404,726	199,549
Machinery manufacturing	1,505,103	1,221,557	283,546	628,181	263,294
Computer and electronic product manufacturing	4,127,249	3,296,125	831,125	2,870,441	1,239,743
Communications equipment manufacturing	999,001	853,188	145,813	668,313	292,523
Semiconductor and other electronic component manufacturing	1,264,997	817,569	447,428	693,099	324,422
Other computer and electronic manufacturing	1,863,251	1,625,367	237,883	1,509,029	622,798
Electric equipment, appliance, and component manufacturing	1,576,609	754,252	822,357	399,169	595,929
Transportation equipment manufacturing	3,018,952	1,648,771	1,370,181	781,104	1,988,217
Motor vehicles and parts manufacturing	2,807,774	1,513,743	1,294,031	738,311	1,815,960
Other transportation equipment manufacturing	211,178	135,028	* 76,150	42,794	172,257
Furniture and related product manufacturing	83,833	61,610	* 22,223	* 11,572	* 3,441
Miscellaneous manufacturing	3,556,188	2,766,510	789,678	713,531	684,423
Medical and equipment supplies manufacturing	1,483,234	1,009,522	473,712	178,402	291,253
Other miscellaneous manufacturing	2,072,954	1,756,987	315,967	535,129	393,170
Distribution and transportation of goods	15,607,374	8,856,732	6,750,642	4,030,637	8,705,972
Wholesale and retail trade	14,448,666	8,466,614	5,982,052	3,912,210	7,469,795
Wholesale trade	10,728,566	6,214,226	4,514,340	2,849,800	6,024,821
Motor vehicle and motor vehicle parts and supplies wholesalers	216,486	184,091	32,395	119,078	51,549
Professional and commercial equipment and supplies wholesalers	80,776	75,525	* 5,251	51,154	233,324
Electrical and electronic goods wholesalers	436,990	341,087	95,903	165,476	278,753
Machinery, equipment, and suppliers wholesalers	545,659	411,134	134,525	297,158	331,634

Footnotes at end of table.

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
	(12)	(13)	(14)	(15)	(16)
Drugs and druggists' sundries wholesalers	1,071,111	857,661	213,450	108,603	370,882
Apparel, piece goods, and notions wholesalers	280,730	257,271	* 23,459	61,140	76,155
Grocery and related product wholesalers	366,949	238,573	128,376	146,587	123,900
Chemical and allied products wholesalers	464,137	286,219	177,918	121,868	339,288
Petroleum and petroleum products wholesalers	2,025,481	245,437	1,780,044	168,024	2,265,237
Other wholesale trade	5,240,246	3,317,227	1,923,019	1,610,711	1,954,099
Retail trade	3,712,571	2,244,859	1,467,712	1,062,410	1,444,955
Motor vehicle dealers and parts dealers	* 79,401	* 76,094	* 3,307	* 6,300	5,807
Electronics and appliance stores	* 17,462	* 17,462	0	* 5,978	* 16,987
Building materials and garden equipment and suppliers dealers	* 4,264	* 3,975	* 288	* 3,015	* 229,163
Food and beverage stores	* 4,655	* 4,655	0	* 123	* 1,953
Health and personal care stores	* 177,224	* 144,993	* 32,231	* 82,627	* 15,153
Clothing and clothing accessories stores	* 394,428	* 44,844	* 349,584	* 40,740	312,124
General merchandise stores	1,056,350	985,139	* 71,211	* 73,774	* 28,276
Electronic shopping and mail-order houses	* 109,908	* 73,920	* 35,988	* 68,122	26,703
Other retailers	1,868,880	893,776	975,104	781,731	808,788
Wholesale and retail trade not allocable	* 7,530	* 7,530	0	0	* 20
Transportation and warehousing	1,158,708	390,118	768,590	118,427	1,236,177
Air transportation	* 4,091	* 485	* 3,606	* 485	48,810
Water transportation	755,113	* 78,817	676,296	* 20,166	968,669
Truck transportation	61,997	54,438	* 7,560	* 33,985	* 9,552
Support activities for transportation	183,832	111,002	72,831	23,928	139,491
Other transportation	111,481	107,698	* 3,783	* 38,979	65,614
Warehousing and storage	42,194	37,678	* 4,515	* 886	4,040
Information	7,182,894	6,453,724	729,170	4,305,580	678,604
Publishing industries	4,785,498	4,283,337	502,161	3,771,250	393,276
Newspaper, periodical, book and directory publishers	909,839	792,075	117,763	351,738	120,308
Software publishers	3,875,659	3,491,261	384,398	3,419,511	272,968
Motion picture and sound recording industries	1,750,187	1,560,941	189,247	255,830	120,598
Broadcasting (except Internet)	128,602	123,677	* 4,925	* 16,855	13,070
Internet publishing and broadcasting	0	0	0	0	0
Telecommunications	385,344	357,354	* 27,989	164,419	117,333
Internet service providers, Web search portals, and data processing services	41,100	39,566	* 1,534	* 26,753	7,140
Other information services	92,163	88,849	* 3,314	70,474	27,187
Finance, insurance, real estate, and rental and leasing	21,287,176	11,919,322	9,367,854	3,317,628	13,505,475
Finance and insurance	19,806,590	10,883,173	8,923,417	3,095,931	11,588,536
Credit intermediation and related activities	3,647,299	2,793,419	853,880	671,972	1,431,851
Depository credit intermediation	795,237	556,050	* 239,187	466,792	314,614
Nondepository credit intermediation	2,669,017	2,140,237	528,780	184,585	986,817
Activities related to credit intermediation	183,045	97,132	85,913	* 20,594	130,421
Securities, commodity contracts, and other financial investments and related products	6,591,356	3,686,676	2,904,680	1,324,364	4,913,709
Insurance carriers and related activities	4,904,567	3,347,531	1,557,036	548,452	2,613,921
Insurance carriers	2,669,918	1,491,205	1,178,714	153,113	1,932,126
Agencies, brokerages, and other insurance related activities	2,234,648	1,856,326	378,322	395,338	681,795
Funds, trusts, and other financial activities	4,663,368	1,055,547	3,607,822	551,144	2,629,055
Real estate and rental and leasing	1,480,586	1,036,149	444,437	221,697	1,916,938
Rental and leasing services	455,080	325,437	129,643	118,270	1,663,971
Commercial and industrial machinery and equipment rental and leasing	418,502	288,859	129,643	118,020	1,619,182
Other rental and leasing services	* 36,578	* 36,578	0	* 250	* 44,789
Other real estate and rental and leasing	1,025,506	710,712	314,794	103,427	252,968

Footnotes at end of table.

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
	(12)	(13)	(14)	(15)	(16)
Services	31,805,437	17,319,610	14,485,827	8,970,235	12,067,414
Professional, scientific, and technical services	4,298,087	3,013,334	1,284,753	1,648,444	2,375,961
Architectural, engineering, and related services	98,061	63,618	34,442	44,923	81,687
Computer system design and related services	1,576,166	895,519	680,647	513,868	990,107
Custom computer programming services	* 4,095	* 4,095	0	* 3,849	16,061
Computer systems design services	116,691	60,742	* 55,949	39,418	71,408
Other computer system design and related services	1,455,380	830,682	624,698	470,601	902,639
Management, scientific, and technical consulting services	229,263	155,124	74,139	74,575	661,929
Scientific research and development services	* 35,773	* 14,554	* 21,219	* 6,209	59,327
Advertising and related services	921,054	740,225	180,829	176,089	89,441
Other professional, scientific, and technical services	1,437,770	1,144,294	293,477	832,779	493,470
Management of companies and enterprises	25,960,648	13,048,892	12,911,756	6,844,044	9,204,124
Administration and support and waste management and remediation services	268,215	187,908	80,307	72,031	171,024
Educational services	42,901	24,601	* 18,300	22,515	* 4,518
Health care and social assistance	57,277	55,575	* 1,702	* 26,087	72,742
Arts, entertainment, and recreation	49,696	48,443	* 1,253	* 22,404	14,926
Accommodation and food services	807,499	698,338	109,161	279,037	66,775
Other services (except public administration)	321,115	242,519	78,596	55,674	157,345
Nature of business not allocable	* 18,587	* 18,577	* 10	* 410	6,798

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Receipts by foreign corporations from:						
	All sources	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
All industries	3,795,850,571	1,030,284,624	178,950,203	182,688,301	668,398,192	247,928	2,787,272,960
Raw materials and energy production	127,239,949	29,296,920	4,231,117	10,848,927	14,209,154	* 7,723	98,340,064
Agriculture, forestry, and fishing	8,568,980	2,903,109	133,528	454,170	2,313,820	* 1,592	5,674,577
Mining	81,962,670	22,067,053	4,095,614	8,208,153	9,760,804	* 2,482	60,217,070
Oil and gas extraction	64,704,216	18,726,210	3,569,373	7,149,288	8,007,549	0	46,145,190
Mining (except oil and gas)	10,801,058	2,128,325	421,784	767,703	936,356	* 2,482	8,673,773
Support activities for mining	6,457,396	1,212,517	104,456	291,162	816,899	0	5,398,107
Utilities	36,708,299	4,326,758	1,975	2,186,604	2,134,529	* 3,650	32,448,418
Goods production	1,633,118,266	586,394,390	125,603,543	87,895,144	372,755,348	140,355	1,051,033,213
Construction	19,078,357	1,289,164	32,539	278,018	978,606	0	17,908,695
Construction of buildings	2,879,061	22,841	0	* 1,860	* 20,982	0	2,856,220
Heavy and civil engineering construction	1,371,193	96,042	* 310	22,321	73,411	0	1,278,537
Specialty trade contractors	14,828,102	1,170,281	32,229	253,838	884,214	0	13,773,938
Manufacturing	1,614,039,909	585,105,226	125,571,004	87,617,126	371,776,741	140,355	1,033,124,518
Food manufacturing	99,299,567	16,187,804	1,507,203	2,244,081	12,436,367	* 153	83,461,471
Beverage and tobacco product manufacturing	81,959,206	26,581,329	213,221	1,267,921	25,031,041	* 69,146	55,499,091
Beverage manufacturing	42,233,593	8,722,200	120,392	1,098,987	7,433,675	* 69,146	33,632,607
Tobacco manufacturing	39,725,612	17,859,129	* 92,830	168,934	17,597,366	0	21,866,483
Textile mills and textile product mills	4,564,718	856,306	215,983	143,470	496,852	0	3,708,960
Apparel manufacturing	12,504,992	5,491,316	1,680,947	1,985,948	1,824,420	0	7,084,413
Leather and allied product manufacturing	2,178,588	885,366	201,701	350,298	333,367	0	1,293,224
Wood product manufacturing	4,726,391	1,116,101	795,659	153,328	167,114	0	3,612,459
Paper manufacturing	41,049,598	9,714,386	2,668,365	2,295,367	4,750,654	0	31,339,463
Petroleum and coal products manufacturing	115,349,158	32,665,459	4,982,430	3,878,175	23,804,855	0	82,686,685
Chemical manufacturing	294,207,268	122,478,193	13,573,716	16,070,195	92,801,569	32,714	173,909,556
Basic chemical manufacturing	36,693,822	7,073,690	1,624,715	652,188	4,770,883	25,904	29,679,767
Pharmaceutical and medicine manufacturing	156,271,797	90,386,437	8,937,714	12,810,909	68,637,814	0	67,739,948
Soap, cleaning compound, and toilet preparation manufacturing	25,675,375	4,145,374	385,784	75,409	3,684,181	0	21,602,583
Other chemical manufacturing	75,566,273	20,872,692	2,625,502	2,531,689	15,708,691	* 6,810	54,887,257
Plastics and rubber products manufacturing	40,801,198	13,335,621	2,392,342	1,081,005	9,862,274	0	27,472,866
Nonmetallic mineral product manufacturing	18,965,226	3,855,206	742,032	480,762	2,632,297	* 115	15,136,911
Primary metal manufacturing	20,038,998	5,148,069	268,379	2,117,650	2,731,535	* 30,504	14,905,206
Fabricated metal product manufacturing	37,732,016	7,614,404	1,241,192	1,451,166	4,921,914	* 132	30,133,811
Machinery manufacturing	60,213,887	16,296,197	3,874,705	2,305,852	10,115,640	0	44,001,440
Computer and electronic product manufacturing	243,939,798	95,145,112	31,931,829	9,800,564	53,407,640	* 5,078	148,968,862
Communications equipment manufacturing	50,304,458	24,673,318	6,486,068	1,448,106	16,739,144	0	25,688,255
Semiconductor and other electronic component manufacturing	78,815,862	30,683,538	15,884,416	2,983,991	11,810,053	* 5,078	48,199,879
Other computer and electronic manufacturing	114,819,478	39,788,256	9,561,345	5,368,467	24,858,444	0	75,080,728
Electric equipment, appliance, and component manufacturing	65,334,991	22,739,517	4,471,853	8,174,260	10,093,404	0	42,650,934
Transportation equipment manufacturing	343,430,309	170,409,900	50,932,662	26,877,911	92,598,000	* 1,328	173,210,529
Motor vehicles and parts manufacturing	330,517,949	167,577,588	50,039,114	25,702,670	91,834,475	* 1,328	163,128,966
Other transportation equipment manufacturing	12,912,360	2,832,313	893,547	1,175,241	763,525	0	10,081,564
Furniture and related product manufacturing	3,601,417	893,245	412,306	128,045	352,894	0	2,708,626
Miscellaneous manufacturing	124,142,585	33,691,695	3,464,479	6,811,127	23,414,904	* 1,185	91,340,010
Medical and equipment supplies manufacturing	51,632,585	17,476,461	1,034,976	3,647,327	12,793,098	* 1,059	34,956,186
Other miscellaneous manufacturing	72,510,000	16,215,233	2,429,503	3,163,800	10,621,805	* 125	56,383,824
Distribution and transportation of goods	966,617,230	187,608,587	23,294,086	47,920,107	116,359,331	35,062	784,639,700
Wholesale and retail trade	928,941,783	177,031,059	23,077,591	42,800,137	111,118,268	35,062	757,453,305
Wholesale trade	670,099,617	152,887,383	21,675,070	30,830,674	100,348,667	32,973	522,439,032
Motor vehicle and motor vehicle parts and supplies wholesalers	33,635,059	5,403,524	1,806,608	259,623	3,337,293	0	28,396,657
Professional and commercial equipment and supplies wholesalers	9,498,981	3,438,198	2,083,342	107,041	1,247,440	* 375	6,073,825
Electrical and electronic goods wholesalers	60,822,703	10,074,900	4,339,146	548,172	5,187,583	* [2]	51,196,609
Machinery, equipment, and suppliers wholesalers	42,984,479	9,371,093	2,967,215	367,118	6,036,759	0	35,078,306

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Receipts by foreign corporations from:						
	All sources	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
Drugs and druggists' sundries wholesalers	58,782,720	23,298,303	1,907,229	3,032,297	18,358,778	0	38,324,240
Apparel, piece goods, and notions wholesalers	9,635,183	2,056,591	92,760	164,489	1,799,343	0	7,582,830
Grocery and related product wholesalers	20,174,915	3,905,562	197,784	1,011,544	2,696,234	0	16,275,610
Chemical and allied products wholesalers	30,918,483	5,187,229	1,212,037	335,992	3,639,200	0	25,756,954
Petroleum and petroleum products wholesalers	157,337,049	31,015,935	114,587	14,623,255	16,278,093	0	126,334,177
Other wholesale trade	246,310,047	59,136,046	6,954,362	10,381,143	41,767,943	* 32,598	187,419,824
Retail trade	258,557,958	24,095,049	1,396,388	11,967,630	10,728,942	* 2,090	234,778,692
Motor vehicle dealers and parts dealers	20,038,218	3,653,092	* 41,791	1,633,202	1,978,099	0	16,385,129
Electronics and appliance stores	8,246,386	728,497	333,476	236,375	158,646	0	7,518,872
Building materials and garden equipment and suppliers dealers	5,388,728	167,492	* 36,267	17,957	113,268	0	5,222,805
Food and beverage stores	12,004,815	70,696	* 30,804	* 6,322	* 33,570	0	11,934,119
Health and personal care stores	3,806,153	466,907	33,220	* 155	433,532	0	3,411,849
Clothing and clothing accessories stores	9,841,109	1,409,226	122,886	* 524,381	761,959	0	8,539,774
General merchandise stores	84,489,591	578,020	* 44	* 4,359	571,746	* 1,870	83,913,090
Electronic shopping and mail-order houses	2,319,859	212,427	* 9,497	55,933	146,777	* 220	2,163,897
Other retailers	112,423,100	16,808,693	788,402	9,488,947	6,531,344	0	95,689,159
Wholesale and retail trade not allocable	284,208	* 48,627	* 6,133	* 1,834	* 40,659	0	235,581
Transportation and warehousing	37,675,447	10,577,528	216,495	5,119,970	5,241,063	0	27,186,395
Air transportation	3,345,236	344,452	0	262,686	81,766	0	3,000,889
Water transportation	6,800,469	2,687,279	* 64,266	1,709,671	913,342	0	4,132,962
Truck transportation	3,729,748	563,371	5,522	100,793	457,055	0	3,170,782
Support activities for transportation	16,094,284	5,458,852	99,874	2,207,957	3,151,022	0	10,643,479
Other transportation	5,462,247	876,796	* 20,979	631,116	224,700	0	4,621,219
Warehousing and storage	2,243,463	646,778	25,854	207,747	413,177	0	1,617,065
Information	95,170,491	11,448,267	1,634,057	1,998,641	7,815,498	* 71	83,807,015
Publishing industries	24,196,690	2,176,145	1,004,320	179,438	992,387	0	22,030,106
Newspaper, periodical, book and directory publishers	10,282,763	675,215	109,640	90,045	475,529	0	9,608,842
Software publishers	13,913,926	1,500,930	894,679	89,393	516,858	0	12,421,264
Motion picture and sound recording industries	22,711,463	2,790,460	6,930	757,998	2,025,532	0	19,931,764
Broadcasting (except Internet)	8,520,648	987,825	* 9,704	61,806	916,315	0	7,533,951
Internet publishing and broadcasting	106,435	* 38,489	* 1,139	* 34,234	* 3,116	0	67,946
Telecommunications	29,876,528	4,081,956	380,291	538,905	3,162,689	* 71	25,834,685
Internet service providers, Web search portals, and data processing services	4,987,803	625,380	79,697	78,454	467,228	0	4,379,235
Other information services	4,770,923	748,012	151,975	347,806	248,231	0	4,029,328
Finance, insurance, real estate, and rental and leasing	356,043,531	72,993,541	5,016,079	18,046,853	49,902,031	28,579	286,518,993
Finance and insurance	332,614,003	68,324,088	4,862,482	17,609,268	45,824,466	* 27,872	266,055,344
Credit intermediation and related activities	71,175,766	11,020,868	266,611	2,481,180	8,266,370	* 6,707	60,391,108
Depository credit intermediation	21,104,785	2,150,291	* 701	1,521,263	628,327	0	18,960,978
Nondepository credit intermediation	45,584,160	7,700,781	144,923	797,123	6,752,028	* 6,707	38,104,605
Activities related to credit intermediation	4,486,820	1,169,797	120,988	162,794	886,015	0	3,325,525
Securities, commodity contracts, and other financial investments and related products	134,418,148	43,507,379	3,828,428	12,366,645	27,290,153	* 22,153	91,273,294
Insurance carriers and related activities	98,474,315	4,675,131	458,454	1,558,658	2,659,094	* -1,076	94,201,016
Insurance carriers	68,604,725	1,532,677	291,041	512,446	730,266	* -1,076	67,101,524
Agencies, brokerages, and other insurance related activities	29,869,591	3,142,454	167,413	1,046,213	1,928,828	0	27,099,492
Funds, trusts, and other financial activities	28,545,774	9,120,710	308,989	1,202,784	7,608,848	* 88	20,189,926
Real estate and rental and leasing	23,429,529	4,669,453	153,596	437,585	4,077,565	* 707	20,463,650
Rental and leasing services	13,015,964	2,724,044	58,525	74,981	2,589,831	* 707	11,937,768
Commercial and industrial machinery and equipment rental and leasing	5,456,238	2,402,025	40,181	49,460	2,311,678	* 707	4,700,061
Other rental and leasing services	7,559,726	322,019	* 18,344	25,521	278,153	0	7,237,707
Other real estate and rental and leasing	10,413,565	1,945,409	95,072	362,604	1,487,734	0	8,525,881

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Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Receipts by foreign corporations from:						
	All sources	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
Services	616,353,220	142,325,656	19,147,443	15,947,123	107,194,953	36,137	481,841,887
Professional, scientific, and technical services	262,157,131	53,285,956	11,427,442	10,168,399	31,680,661	9,455	210,554,458
Architectural, engineering, and related services	10,729,183	1,163,649	265,134	187,281	711,173	* 62	9,596,624
Computer system design and related services	111,649,649	20,612,339	5,896,973	4,208,111	10,503,187	* 4,069	91,299,330
Custom computer programming services	2,026,579	693,687	322,571	200,370	166,678	* 4,069	1,344,046
Computer systems design services	8,265,860	1,420,054	760,942	180,085	479,027	0	6,850,743
Other computer system design and related services	101,357,211	18,498,598	4,813,461	3,827,656	9,857,481	0	83,104,541
Management, scientific, and technical consulting services	12,261,360	5,278,259	706,246	762,837	3,809,176	0	7,107,174
Scientific research and development services	4,235,699	2,288,574	954,344	537,174	796,416	* 641	2,040,194
Advertising and related services	42,982,333	5,147,743	215,588	219,430	4,708,930	3,795	37,937,457
Other professional, scientific, and technical services	80,298,907	18,795,391	3,389,157	4,253,567	11,151,781	* 887	62,573,679
Management of companies and enterprises	273,299,270	76,337,514	6,488,191	4,117,549	65,705,263	* 26,511	202,495,335
Administration and support and waste management and remediation services	33,211,070	8,156,603	633,961	947,335	6,575,306	0	25,571,558
Educational services	1,733,426	148,342	* 1,572	1,913	144,857	0	1,608,128
Health care and social assistance	2,914,929	261,816	31,378	2,074	228,364	0	2,656,043
Arts, entertainment, and recreation	6,092,568	1,029,151	281,163	188,662	559,326	0	5,079,242
Accommodation and food services	25,129,124	777,755	43,851	158,882	574,849	* 172	24,362,257
Other services (except public administration)	11,815,704	2,328,519	239,884	362,309	1,726,326	0	9,514,865
Nature of business not allocable	1,307,883	217,263	* 23,878	31,507	161,878	0	1,092,088

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Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Payments by foreign corporations to:						
	All recipients	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
All industries	3,528,629,281	1,075,521,968	234,870,915	224,166,893	615,661,945	822,216	2,482,722,738
Raw materials and energy production	110,118,221	26,941,433	2,697,200	9,621,832	14,618,969	* 3,433	83,529,678
Agriculture, forestry, and fishing	7,891,172	2,161,021	161,827	406,155	1,592,873	* 167	5,749,170
Mining	68,426,845	21,035,285	2,477,811	8,798,778	9,758,168	* 529	47,646,612
Oil and gas extraction	53,473,687	18,644,861	2,194,169	7,814,205	8,636,488	0	35,021,814
Mining (except oil and gas)	8,945,592	1,376,342	167,543	415,248	793,022	* 529	7,580,743
Support activities for mining	6,007,566	1,014,082	116,099	569,325	328,658	0	5,044,055
Utilities	33,800,204	3,745,127	57,563	416,899	3,267,928	* 2,737	30,133,896
Goods production	1,516,669,958	471,904,526	120,735,488	88,687,221	262,190,366	291,452	1,048,195,864
Construction	18,406,045	1,598,848	96,063	315,039	1,187,746	0	16,846,387
Construction of buildings	2,767,302	56,145	27,604	* 14,600	13,942	0	2,713,041
Heavy and civil engineering construction	1,331,810	55,263	4,926	25,552	24,786	0	1,277,324
Specialty trade contractors	14,306,934	1,487,439	63,533	274,888	1,149,019	0	12,856,022
Manufacturing	1,498,263,912	470,305,678	120,639,425	88,372,181	261,002,619	291,452	1,031,349,477
Food manufacturing	95,593,130	16,306,433	1,790,307	2,859,209	11,538,704	* 118,214	79,369,272
Beverage and tobacco product manufacturing	74,305,227	17,816,297	1,768,998	4,856,101	11,191,197	0	56,533,491
Beverage manufacturing	36,460,213	8,396,216	1,673,457	2,134,437	4,588,322	0	28,073,841
Tobacco manufacturing	37,845,013	9,420,080	* 95,541	2,721,664	6,602,875	0	28,459,650
Textile mills and textile product mills	4,487,489	784,282	270,108	213,772	298,394	* 2,008	3,703,801
Apparel manufacturing	12,944,944	3,951,365	1,175,355	1,399,350	1,376,655	* 5	9,068,385
Leather and allied product manufacturing	2,096,898	588,880	313,837	* 32,094	242,949	0	1,508,018
Wood product manufacturing	4,555,791	500,249	123,942	128,845	247,462	0	4,056,252
Paper manufacturing	40,614,470	7,399,925	2,537,957	1,015,097	3,846,871	0	33,243,014
Petroleum and coal products manufacturing	110,387,935	41,055,793	7,747,733	15,074,185	18,233,621	* 255	69,368,495
Chemical manufacturing	252,782,221	98,823,129	27,355,352	13,923,467	57,433,110	111,201	155,341,212
Basic chemical manufacturing	33,884,950	8,276,705	1,823,123	2,116,988	4,226,152	110,443	25,642,292
Pharmaceutical and medicine manufacturing	122,094,985	61,702,970	17,603,288	7,060,544	37,039,138	0	61,496,517
Soap, cleaning compound, and toilet preparation manufacturing	23,519,742	7,580,845	1,794,451	736,799	5,049,595	0	16,047,828
Other chemical manufacturing	73,282,544	21,262,609	6,134,490	4,009,136	11,118,225	* 758	52,154,575
Plastics and rubber products manufacturing	38,928,127	9,253,788	2,215,810	1,121,948	5,916,031	0	29,695,629
Nonmetallic mineral product manufacturing	17,014,286	3,367,441	1,167,315	792,491	1,384,222	* 23,412	13,647,145
Primary metal manufacturing	18,172,028	3,110,677	316,593	1,130,665	1,663,419	0	15,070,984
Fabricated metal product manufacturing	35,837,982	7,223,931	1,748,374	1,643,080	3,822,635	* 9,842	28,641,029
Machinery manufacturing	58,222,242	12,767,596	3,688,088	2,620,628	6,458,880	0	45,549,309
Computer and electronic product manufacturing	228,021,272	88,893,682	31,712,858	16,604,538	40,565,932	* 10,355	139,567,449
Communications equipment manufacturing	48,171,347	20,261,696	5,132,917	1,304,921	13,823,859	0	27,944,010
Semiconductor and other electronic component manufacturing	74,408,766	31,641,595	20,956,897	2,561,867	8,112,477	* 10,355	42,926,189
Other computer and electronic manufacturing	105,441,159	36,990,391	5,623,044	12,737,751	18,629,596	0	68,697,251
Electric equipment, appliance, and component manufacturing	61,180,746	13,805,802	3,568,023	2,931,953	7,304,297	* 1,529	47,604,965
Transportation equipment manufacturing	340,391,550	113,914,446	26,871,719	15,718,137	71,321,086	* 3,504	226,628,392
Motor vehicles and parts manufacturing	328,032,162	111,024,258	26,063,444	14,744,043	70,213,267	* 3,504	217,087,912
Other transportation equipment manufacturing	12,359,387	2,890,188	808,275	974,094	1,107,819	0	9,540,480
Furniture and related product manufacturing	3,651,842	639,957	251,941	48,090	339,926	0	3,016,593
Miscellaneous manufacturing	99,075,732	30,102,004	6,015,115	6,258,532	17,817,228	* 11,129	69,736,041
Medical and equipment supplies manufacturing	30,750,341	12,679,998	1,423,908	3,217,439	8,037,471	* 1,180	18,325,289
Other miscellaneous manufacturing	68,325,392	17,422,006	4,591,207	3,041,093	9,779,757	* 9,949	51,410,752
Distribution and transportation of goods	926,291,647	298,409,189	52,477,734	66,917,712	178,998,140	15,603	635,640,389
Wholesale and retail trade	890,407,554	287,580,918	51,925,324	61,522,144	174,117,846	15,603	610,468,954
Wholesale trade	641,592,155	240,482,306	44,773,206	45,561,851	150,136,116	11,134	408,565,629
Motor vehicle and motor vehicle parts and supplies wholesalers	32,712,619	17,748,345	1,626,428	1,441,946	14,679,971	0	15,026,372
Professional and commercial equipment and supplies wholesalers	7,837,290	3,273,086	868,772	673,587	1,729,269	* 1,458	4,601,293
Electrical and electronic goods wholesalers	58,771,903	27,626,093	12,216,300	3,715,400	11,694,393	0	32,796,725
Machinery, equipment, and suppliers wholesalers	40,463,680	23,605,484	7,591,060	1,970,526	14,043,085	* 812	20,817,549

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Payments by foreign corporations to:						
	All recipients	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
Drugs and druggists' sundries wholesalers	54,366,844	18,165,577	1,547,780	2,040,479	14,577,318	0	36,616,680
Apparel, piece goods, and notions wholesalers	9,304,513	2,812,752	387,292	382,099	2,043,361	0	6,501,515
Grocery and related product wholesalers	19,581,918	6,750,223	543,967	332,000	5,873,794	* 462	12,844,395
Chemical and allied products wholesalers	29,754,794	13,299,717	3,479,865	1,998,065	7,821,787	0	16,574,389
Petroleum and petroleum products wholesalers	152,304,229	27,409,399	729,732	15,988,983	10,690,684	0	125,492,559
Other wholesale trade	236,494,365	99,791,631	15,782,010	17,018,767	66,982,453	* 8,401	137,294,152
Retail trade	248,540,738	46,954,866	7,127,800	15,949,822	23,872,775	* 4,469	201,772,409
Motor vehicle dealers and parts dealers	19,846,556	10,189,581	67,830	766,968	9,354,783	0	9,657,248
Electronics and appliance stores	8,057,289	1,917,125	254,706	405,944	1,256,475	0	6,152,136
Building materials and garden equipment and suppliers dealers	5,108,724	447,932	53,684	209,069	185,179	0	4,660,890
Food and beverage stores	11,799,635	484,983	299,954	117,781	* 67,248	0	11,314,900
Health and personal care stores	3,651,159	469,181	108,844	145,170	215,167	0	3,187,098
Clothing and clothing accessories stores	9,339,710	1,975,179	221,883	569,056	1,184,240	0	7,394,849
General merchandise stores	83,345,253	3,644,720	946,076	447,748	2,248,208	* 2,687	79,705,734
Electronic shopping and mail-order houses	2,280,967	465,702	114,059	200,877	148,983	* 1,783	1,815,559
Other retailers	105,111,444	27,360,464	5,060,764	13,087,208	9,212,492	0	77,883,995
Wholesale and retail trade not allocable	274,662	* 143,745	* 24,318	* 10,472	* 108,955	0	130,916
Transportation and warehousing	35,884,093	10,828,271	552,410	5,395,568	4,880,293	0	25,171,434
Air transportation	3,243,283	208,641	* 22,812	139,404	46,426	0	3,034,674
Water transportation	6,244,643	1,007,601	201,782	181,407	624,412	0	5,240,270
Truck transportation	3,718,611	448,342	39,454	149,521	259,367	0	3,271,860
Support activities for transportation	15,363,193	6,399,176	219,096	2,921,757	3,258,323	0	9,071,672
Other transportation	5,157,061	2,175,660	7,850	1,906,603	261,206	0	2,981,736
Warehousing and storage	2,157,303	588,851	61,416	96,876	430,559	0	1,571,223
Information	94,339,501	22,085,218	6,828,301	7,355,442	7,889,450	* 12,026	72,386,356
Publishing industries	24,753,885	8,740,973	5,646,679	2,095,675	998,619	0	16,021,447
Newspaper, periodical, book and directory publishers	9,680,915	1,776,732	331,095	756,758	688,879	0	7,912,116
Software publishers	15,072,971	6,964,241	5,315,583	1,338,918	309,740	0	8,109,331
Motion picture and sound recording industries	22,703,118	7,077,842	507,535	3,687,091	2,878,898	* 4,318	15,671,006
Broadcasting (except Internet)	8,327,847	1,019,540	19,963	175,959	823,618	0	7,313,987
Internet publishing and broadcasting	103,486	* 25,586	* 408	* 17,096	* 8,082	0	78,307
Telecommunications	29,760,821	3,379,131	205,915	646,675	2,518,833	* 7,708	26,410,679
Internet service providers, Web search portals, and data processing services	4,406,077	836,351	359,824	202,313	274,215	0	3,607,635
Other information services	4,284,267	1,005,795	87,978	530,632	387,185	0	3,283,294
Finance, insurance, real estate, and rental and leasing	315,567,121	89,650,937	13,561,621	21,325,102	54,628,262	135,952	229,306,618
Finance and insurance	291,777,079	85,335,585	13,168,706	20,468,807	51,566,822	131,249	209,711,754
Credit intermediation and related activities	58,309,393	15,003,043	632,788	4,323,400	10,033,625	* 13,230	43,638,138
Depository credit intermediation	15,880,806	3,348,317	28,905	1,848,858	1,470,554	0	12,533,032
Nondepository credit intermediation	38,768,374	10,635,364	522,051	2,290,677	7,809,405	* 13,230	28,431,924
Activities related to credit intermediation	3,660,212	1,019,362	81,832	183,864	753,666	0	2,673,183
Securities, commodity contracts, and other financial investments and related products	118,972,608	48,986,108	12,078,355	9,513,498	27,286,476	* 107,778	71,368,864
Insurance carriers and related activities	90,041,186	13,003,703	291,517	2,579,113	10,131,711	* 1,363	78,553,343
Insurance carriers	62,702,383	9,138,154	180,109	1,922,458	7,035,580	* 6	55,032,391
Agencies, brokerages, and other insurance related activities	27,338,803	3,865,549	111,407	656,655	3,096,130	* 1,357	23,520,951
Funds, trusts, and other financial activities	24,453,892	8,342,731	166,046	4,052,796	4,115,010	* 8,878	16,151,409
Real estate and rental and leasing	23,790,042	4,315,352	392,915	856,295	3,061,439	* 4,702	19,594,863
Rental and leasing services	13,386,375	2,041,976	174,837	386,904	1,475,572	* 4,664	11,424,733
Commercial and industrial machinery and equipment rental and leasing	5,923,371	1,387,614	119,797	319,070	946,441	* 2,307	4,606,390
Other rental and leasing services	7,463,004	654,362	55,040	67,834	529,131	* 2,357	6,818,343
Other real estate and rental and leasing	10,403,667	2,273,376	218,078	469,392	1,585,868	* 39	8,170,130

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 1. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Industrial Sector and Selected Industrial Subsector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Industrial sector and selected industrial subsector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Payments by foreign corporations to:						
	All recipients	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
Services	564,298,825	166,408,251	38,554,314	30,228,176	97,262,011	363,749	412,439,635
Professional, scientific, and technical services	245,053,918	75,412,048	25,788,109	12,644,006	36,926,036	53,897	180,821,661
Architectural, engineering, and related services	10,303,614	1,201,261	610,869	188,820	401,471	* 101	9,124,115
Computer system design and related services	100,461,303	41,775,163	20,174,828	8,057,593	13,542,743	0	68,718,241
Custom computer programming services	1,871,492	407,065	187,921	66,360	152,784	0	1,478,878
Computer systems design services	7,967,488	2,499,747	1,424,189	308,461	767,097	0	5,485,194
Other computer system design and related services	90,622,323	38,868,351	18,562,718	7,682,772	12,622,862	0	61,754,169
Management, scientific, and technical consulting services	11,413,780	2,630,520	579,306	323,283	1,727,931	0	8,832,935
Scientific research and development services	4,326,360	605,496	216,142	83,205	306,148	0	3,743,410
Advertising and related services	42,102,883	13,138,035	363,040	1,243,975	11,522,646	8,374	29,011,518
Other professional, scientific, and technical services	76,445,977	16,061,573	3,843,923	2,747,130	9,425,098	* 45,423	61,391,442
Management of companies and enterprises	241,367,327	80,387,718	9,618,184	15,409,923	55,086,236	273,375	163,971,344
Administration and support and waste management and remediation services	32,134,376	2,881,114	456,012	421,166	2,003,725	* 211	29,365,181
Educational services	1,634,024	278,037	68,663	50,487	158,887	0	1,415,394
Health care and social assistance	2,681,896	515,256	53,702	60,909	400,645	0	2,316,678
Arts, entertainment, and recreation	6,165,374	1,042,275	200,611	412,711	428,952	0	5,123,112
Accommodation and food services	24,242,868	2,683,179	654,165	641,584	1,351,165	* 36,266	21,568,311
Other services (except public administration)	11,019,042	3,208,625	1,714,869	587,390	906,366	0	7,857,953
Nature of business not allocable	1,344,009	122,413	16,257	31,407	74,747	* 2	1,224,199

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

[1] Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one industrial sector. The industrial activity of the parent corporation filing the return often differs from that of the Controlled Foreign Corporations.

[2] Value is less than \$500.

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

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004

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

Selected country of incorporation of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning-of-year	End-of-year	
	(1)	(2)	(3)	(4)	(5)
All geographic regions	10,939	74,676	7,613,683,688	9,217,097,520	3,795,850,571
Latin America, total	3,000	10,693	386,038,955	449,470,022	289,817,056
Mexico	2,249	4,618	199,333,766	243,119,233	153,372,290
Central America and Caribbean countries, total	395	1,135	21,443,511	22,983,242	16,172,951
Costa Rica	170	240	2,784,589	2,838,897	3,027,837
Dominican Republic	81	97	1,511,585	2,085,599	1,440,764
El Salvador	75	108	2,225,905	2,242,591	1,820,153
Guatemala	122	201	2,285,843	2,589,567	2,628,853
Honduras	77	160	1,073,077	1,260,753	1,937,940
Panama (including Canal Zone)	159	266	11,236,091	11,615,688	4,899,353
Other Central American and Caribbean countries	52	63	326,422	350,148	418,052
South America, total	1,411	4,939	165,261,678	183,367,547	120,271,814
Argentina	529	861	17,639,305	19,522,148	20,457,604
Bolivia	48	64	1,074,473	1,095,463	477,300
Brazil	971	1,677	84,392,775	94,877,634	58,858,281
Chile	394	712	28,344,498	30,496,318	11,789,089
Colombia	286	437	7,675,920	9,646,609	7,774,699
Ecuador	91	160	1,549,451	1,736,525	2,476,128
Peru	187	240	5,294,891	6,461,399	3,127,021
Uruguay	149	211	1,934,268	1,942,299	2,204,335
Venezuela	325	525	16,692,424	17,020,446	11,896,056
Other South American countries	39	53	663,674	568,704	1,211,301
Other Western Hemisphere, total	4,319	10,277	1,535,444,871	1,795,027,510	699,167,565
Bahamas	93	384	42,451,711	52,616,671	13,866,726
Barbados	121	154	10,070,902	9,984,235	3,429,763
Bermuda	450	974	403,544,887	467,439,769	155,961,340
British Virgin Islands	230	348	49,494,423	51,678,990	17,749,464
Canada	3,592	6,559	648,656,325	742,560,256	421,174,846
Cayman Islands	548	1,402	344,461,974	426,218,389	81,568,359
Jamaica	45	62	1,618,247	1,669,622	897,820
Netherlands Antilles	120	161	31,973,407	40,243,483	2,917,620
Trinidad and Tobago	42	52	1,027,679	979,096	314,731
Other Western Hemisphere countries	79	181	2,145,315	1,636,999	1,286,896
Europe, total	5,745	33,719	4,684,554,618	5,729,046,602	2,062,213,379
European Union, total	5,574	30,810	4,294,596,320	5,319,004,566	1,868,183,270
Austria	362	515	17,804,638	22,445,328	19,330,200
Belgium	711	1,281	85,105,269	95,580,427	53,634,950
Cyprus	56	76	894,371	1,480,541	1,388,524
Czech Republic	323	476	14,477,848	16,107,208	10,031,595
Denmark	414	681	18,948,834	27,675,432	15,208,077
Estonia	45	52	205,185	237,818	317,247
Finland	223	345	9,410,437	10,812,056	6,492,669
Reunion)	1,603	3,857	251,795,752	267,209,715	153,028,917
Germany	1,864	4,121	311,317,302	355,281,624	223,960,105
Greece	182	242	4,730,188	6,253,900	6,811,221
Hungary	284	419	14,500,721	17,198,057	11,758,735
Ireland	607	1,091	208,775,353	315,222,046	103,788,860
Italy	998	1,795	85,896,332	99,292,730	72,388,907
Latvia	36	42	84,979	163,079	202,748
Lithuania	31	33	362,069	499,484	411,748
Luxembourg	260	439	415,606,232	568,027,649	157,504,240
Malta	11	17	791,631	847,516	491,037
Netherlands	1,371	3,151	647,998,050	809,568,942	297,741,740
Poland	400	650	23,609,142	28,109,245	18,551,896
Portugal (including Azores)	238	399	19,107,469	21,930,775	14,110,759
Slovakia	119	164	2,823,783	3,338,778	2,641,785

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning-of-year	End-of-year	
	(1)	(2)	(3)	(4)	(5)
Slovenia	36	40	367,675	593,762	924,802
Spain (including Canary Islands)	846	1,640	121,387,014	135,498,522	124,745,092
Sweden	592	1,055	65,788,559	72,202,182	43,963,634
United Kingdom and Northern Ireland (including Gibraltar)	3,721	8,227	1,972,807,487	2,443,427,749	528,753,781
Other European countries, total	1,098	2,909	389,958,298	410,042,036	194,030,109
Guernsey	32	59	981,373	4,234,617	402,259
Jersey	65	116	52,761,682	41,848,491	6,677,628
Norway	262	424	22,604,486	24,038,872	12,846,046
Romania	107	131	1,573,238	2,283,602	2,131,759
Russia	239	441	4,975,878	6,120,600	8,147,430
Switzerland	753	1,389	302,337,653	326,515,781	158,484,729
Ukraine	60	93	1,242,823	1,106,069	2,133,174
Other European countries	150	255	3,481,165	3,894,005	3,207,084
Africa, total	600	1,511	32,459,202	37,675,168	32,185,416
North Africa, total	127	229	2,853,308	3,091,486	3,315,831
Egypt	74	110	1,607,565	1,742,088	1,803,647
Morocco	55	63	878,202	951,622	1,021,743
Other North African countries	36	56	367,542	397,775	490,441
East Africa, total	190	275	5,968,471	7,711,251	3,341,112
Mauritius	156	187	4,781,150	6,390,758	1,930,671
Other East African countries	50	88	1,187,321	1,320,493	1,410,441
West and Central Africa, total	104	269	11,487,853	12,735,280	6,791,500
Liberia	31	97	6,904,612	7,479,409	3,014,292
Nigeria	50	76	3,254,729	4,008,119	1,656,448
Other West and Central African countries	45	96	1,328,512	1,247,752	2,120,760
Southern Africa, total	380	738	12,149,569	14,137,152	18,736,973
South Africa	369	623	11,354,152	13,274,856	17,521,365
Other Southern African countries	44	115	795,417	862,296	1,215,608
Asia, total	3,961	14,338	708,461,158	871,156,736	574,582,693
Central, Northern, and Southwestern Asia, total	206	304	7,082,915	9,714,871	17,251,629
Turkey	179	249	6,086,014	8,567,233	16,734,751
countries	40	55	996,902	1,147,638	516,878
Middle East, total	901	1,200	21,020,267	23,566,604	13,573,162
Israel	795	993	18,890,558	20,784,509	10,899,661
United Arab Emirates	75	86	609,894	913,632	1,324,706
Other Middle East countries	79	121	1,519,815	1,868,462	1,348,795
Southern and Southeastern Asia, total	1,806	5,190	149,172,438	175,925,073	171,241,854
India	872	1,226	14,134,939	17,319,866	16,996,271
Indonesia	196	294	10,239,618	10,857,064	7,237,821
Malaysia	480	791	24,043,518	28,267,132	20,876,512
Pakistan	40	50	607,315	639,260	696,233
Philippines	278	478	13,823,574	14,280,946	11,256,018
Singapore	1,007	1,555	69,612,527	85,185,931	90,352,458
Thailand	398	663	16,117,776	18,710,822	22,942,053
Vietnam	43	51	308,921	354,937	430,472
Other Southern and Southeastern Asian countries	53	82	284,250	309,115	454,017
Eastern Asia, total	2,580	7,645	531,185,538	661,950,188	372,516,049
China	1,161	2,264	28,663,251	38,208,863	48,118,616
Hong Kong	1,054	1,800	81,222,475	86,690,433	52,176,026
Japan (including Okinawa and Ryukyu Islands)	1,276	2,265	340,626,466	391,520,947	199,289,733
South Korea	560	757	44,175,322	100,196,395	44,396,044
Taiwan	396	539	36,076,030	44,649,995	27,409,364
Other Eastern Asian countries	18	19	421,994	683,555	1,126,266

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations			
		Number of foreign corporations	Total assets		Total receipts
			Beginning-of-year	End-of-year	
	(1)	(2)	(3)	(4)	(5)
Oceania, total	1,433	3,613	237,315,103	305,672,278	118,773,853
Australia	1,325	2,807	195,769,614	260,959,465	102,982,038
New Zealand	420	696	38,750,111	41,788,662	14,586,170
Marshall Islands	4	52	2,216,743	2,241,381	893,462
Other countries of Oceania	35	59	578,635	682,769	312,183
Puerto Rico and U.S. Possessions, total	327	520	29,386,420	29,031,348	19,060,268
Puerto Rico	273	395	26,247,589	25,918,909	17,189,828
U.S. Possessions, total	74	125	3,138,831	3,112,440	1,870,440
Virgin Islands, U.S.	42	66	2,421,569	2,401,433	935,662
Other U.S. Possessions	38	59	717,262	711,006	934,778
Other country or unknown	3	4	* 23,362	* 17,857	* 50,343
OPEC countries, total (countries included above)	491	1,054	31,601,356	33,702,308	23,172,918

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
All geographic regions	362,199,144	69,252,227	292,946,918	432,572,981	67,997,857	364,575,123
Latin America, total	24,766,720	6,343,901	18,422,820	30,626,745	6,074,265	24,552,481
Mexico	12,269,344	3,290,568	8,978,776	14,381,348	3,209,063	11,172,285
Central America and Caribbean countries, total	1,918,429	313,226	1,605,203	2,114,260	306,208	1,808,052
Costa Rica	360,726	36,100	324,626	403,926	34,749	369,177
Dominican Republic	405,865	70,821	335,044	412,255	70,179	342,076
El Salvador	96,134	19,781	76,353	116,633	19,320	97,314
Guatemala	178,925	55,003	123,922	216,998	55,617	161,381
Honduras	91,025	12,468	78,557	104,234	10,268	93,966
Panama (including Canal Zone)	717,296	96,373	620,923	787,089	93,489	693,600
Other Central American and Caribbean countries	68,458	22,681	45,777	73,125	22,586	50,538
South America, total	10,578,947	2,740,107	7,838,840	14,131,137	2,558,994	11,572,143
Argentina	1,050,672	314,653	736,019	1,708,272	299,579	1,408,693
Bolivia	54,367	6,316	48,051	67,625	6,220	61,405
Brazil	4,369,304	1,459,802	2,909,502	6,358,952	1,328,099	5,030,853
Chile	1,152,041	138,031	1,014,010	1,536,758	127,335	1,409,424
Colombia	419,031	174,076	244,956	607,796	164,746	443,050
Ecuador	163,170	38,296	124,874	185,032	37,730	147,302
Peru	530,214	116,029	414,185	616,555	112,277	504,278
Uruguay	73,725	11,395	62,331	108,356	11,073	97,283
Venezuela	2,686,301	449,110	2,237,191	2,825,365	444,830	2,380,535
Other South American countries	80,121	32,399	47,722	116,426	27,105	89,321
Other Western Hemisphere, total	87,099,455	15,687,665	71,411,789	99,989,054	15,825,461	84,163,593
Bahamas	3,002,336	850,231	2,152,105	4,052,899	841,934	3,210,964
Barbados	499,420	61,220	438,200	602,984	62,136	540,847
Bermuda	29,060,865	3,205,672	25,855,192	30,886,332	3,176,103	27,710,229
British Virgin Islands	3,026,429	275,742	2,750,687	3,178,987	255,879	2,923,108
Canada	40,662,927	8,706,507	31,956,420	46,224,825	8,995,772	37,229,053
Cayman Islands	10,598,544	2,510,354	8,088,190	14,345,118	2,421,210	11,923,909
Jamaica	54,870	7,607	47,263	85,932	7,607	78,325
Netherlands Antilles	225,776	45,352	180,424	303,200	40,547	262,652
Trinidad and Tobago	52,608	14,783	37,825	68,116	14,657	53,459
Other Western Hemisphere countries	-84,320	10,198	-94,517	240,663	9,615	231,047
Europe, total	180,427,787	32,458,197	147,969,591	221,012,333	31,548,618	189,463,716
European Union, total	156,345,334	28,486,545	127,858,788	194,478,228	27,613,398	166,864,830
Austria	1,290,770	391,061	899,709	1,562,637	384,204	1,178,433
Belgium	2,502,831	688,667	1,814,164	3,560,441	731,072	2,829,370
Cyprus	222,928	21,841	201,087	234,249	22,117	212,132
Czech Republic	929,152	246,742	682,410	1,035,511	241,166	794,346
Denmark	1,053,031	255,864	797,166	1,409,595	250,066	1,159,529
Estonia	14,050	* 1,793	12,257	16,971	* 1,718	15,254
Finland	541,428	119,497	421,931	639,563	118,095	521,468
Reunion)	9,402,259	2,593,965	6,808,294	14,059,756	2,463,041	11,596,715
Germany	8,306,081	2,934,185	5,371,896	13,925,568	2,689,185	11,236,382
Greece	479,245	226,387	252,858	546,774	224,918	321,856
Hungary	1,419,586	141,087	1,278,499	1,569,803	135,636	1,434,167
Ireland	21,691,134	1,619,842	20,071,292	24,780,059	1,600,975	23,179,084
Italy	4,655,594	1,992,530	2,663,064	5,877,222	1,871,272	4,005,950
Latvia	19,003	2,858	16,145	20,136	2,850	17,286
Lithuania	7,622	8,203	-580	47,317	8,183	39,134
Luxembourg	10,485,073	1,014,271	9,470,802	11,302,154	979,228	10,322,927
Malta	45,345	* 940	44,405	46,970	* 920	46,050
Netherlands	41,675,726	4,694,757	36,980,968	46,513,837	4,614,303	41,899,534
Poland	1,558,708	330,082	1,228,626	1,843,817	302,263	1,541,553
Portugal (including Azores)	1,774,372	334,186	1,440,185	1,896,057	338,251	1,557,806
Slovakia	220,304	30,146	190,157	244,635	28,358	216,278

Footnotes at end of table.

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
Slovenia	85,310	17,083	68,228	87,314	16,993	70,321
Spain (including Canary Islands)	8,440,005	3,328,322	5,111,683	9,548,466	3,303,285	6,245,181
Sweden	1,973,261	265,576	1,707,685	3,191,588	254,249	2,937,340
United Kingdom and Northern Ireland (including Gibraltar)	37,552,518	7,226,661	30,325,858	50,517,786	7,031,050	43,486,736
Other European countries, total	24,082,454	3,971,651	20,110,802	26,534,105	3,935,219	22,598,886
Guernsey	306,772	10,588	296,185	323,648	10,587	313,061
Jersey	1,801,585	58,609	1,742,976	2,734,901	53,957	2,680,944
Norway	3,043,562	2,097,751	945,811	3,339,339	2,090,470	1,248,869
Romania	173,531	50,202	123,329	194,778	49,201	145,576
Russia	1,036,076	237,618	798,458	1,139,674	235,689	903,985
Switzerland	17,424,541	1,428,253	15,996,289	18,342,079	1,407,976	16,934,103
Ukraine	158,687	53,719	104,968	174,408	53,191	121,217
Other European countries	137,698	34,911	102,787	285,280	34,148	251,132
Africa, total	2,986,024	887,787	2,098,237	3,866,123	871,777	2,994,346
North Africa, total	167,044	51,320	115,724	250,366	52,559	197,807
Egypt	126,617	36,592	90,026	160,240	36,437	123,803
Morocco	15,418	13,193	2,225	53,416	13,718	39,698
Other North African countries	25,008	1,535	23,474	36,710	2,404	34,306
East Africa, total	399,097	105,194	293,903	481,283	102,846	378,437
Mauritius	345,573	83,651	261,922	399,031	82,296	316,736
Other East African countries	53,524	21,543	31,981	82,251	20,550	61,701
West and Central Africa, total	604,711	172,866	431,845	1,024,674	168,916	855,758
Liberia	584,088	* 85,088	499,000	721,516	* 84,678	636,838
Nigeria	18,554	60,673	-42,119	216,609	58,763	157,846
Other West and Central African countries	2,069	27,104	-25,036	86,550	25,475	61,075
Southern Africa, total	1,815,172	558,408	1,256,765	2,109,801	547,457	1,562,344
South Africa	1,757,602	529,330	1,228,272	2,021,424	524,721	1,496,703
Other Southern African countries	57,570	29,078	28,492	88,377	22,736	65,641
Asia, total	49,155,965	10,839,600	38,316,365	55,934,843	10,641,408	45,293,434
Central, Northern, and Southwestern Asia, total	1,377,356	303,842	1,073,515	1,509,469	301,945	1,207,524
Turkey	1,313,859	279,615	1,034,244	1,415,563	276,848	1,138,715
countries	63,497	24,226	39,271	93,906	25,097	68,809
Middle East, total	978,075	187,160	790,915	1,575,619	174,686	1,400,934
Israel	676,371	177,893	498,478	1,218,951	165,824	1,053,127
United Arab Emirates	194,039	* 1,590	192,450	212,899	* 1,573	211,326
Other Middle East countries	107,665	7,677	99,988	143,769	7,288	136,481
Southern and Southeastern Asia, total	13,807,403	2,275,610	11,531,793	15,269,466	2,236,245	13,033,221
India	1,711,855	430,136	1,281,719	2,134,493	415,843	1,718,650
Indonesia	1,752,661	487,970	1,264,691	1,883,208	485,179	1,398,029
Malaysia	1,728,052	251,829	1,476,223	1,843,494	250,101	1,593,394
Pakistan	101,156	25,333	75,824	106,038	22,924	83,114
Philippines	1,371,488	211,354	1,160,135	1,582,462	205,872	1,376,589
Singapore	5,275,084	572,648	4,702,436	5,698,601	560,961	5,137,640
Thailand	1,838,068	281,564	1,556,504	1,947,203	281,104	1,666,098
Vietnam	-2,144	5,787	-7,931	31,295	5,841	25,454
Other Southern and Southeastern Asian countries	31,182	8,990	22,192	42,672	8,420	34,253
Eastern Asia, total	32,993,131	8,072,988	24,920,142	37,580,289	7,928,533	29,651,756
China	4,334,383	539,739	3,794,644	5,235,719	525,269	4,710,450
Hong Kong	6,247,144	977,378	5,269,766	6,738,648	989,822	5,748,827
Japan (including Okinawa and Ryukyu Islands)	15,104,588	4,975,602	10,128,986	17,628,786	4,877,307	12,751,478
South Korea	4,413,650	1,111,827	3,301,823	4,945,594	1,077,170	3,868,424
Taiwan	2,817,860	467,808	2,350,052	2,955,503	458,330	2,497,173
Other Eastern Asian countries	75,505	634	74,870	76,039	* 634	75,404

Footnotes at end of table.

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued					
	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes	Foreign corporations with current earnings and profits (+) before income taxes		
				Current earnings and profits before income taxes	Income taxes	Current earnings and profits after income taxes
	(6)	(7)	(8)	(9)	(10)	(11)
Oceania, total	14,549,087	2,754,386	11,794,700	17,681,186	2,747,822	14,933,365
Australia	12,341,006	2,439,551	9,901,456	15,310,790	2,438,028	12,872,761
New Zealand	1,603,082	302,271	1,300,811	1,761,544	297,127	1,464,417
Marshall Islands	547,815	* 853	546,962	547,816	* 853	546,962
Other countries of Oceania	57,183	11,711	45,472	61,037	11,813	49,224
Puerto Rico and U.S. Possessions, total	3,212,987	280,485	2,932,502	3,459,892	288,493	3,171,399
Puerto Rico	2,864,682	264,770	2,599,912	2,996,452	264,567	2,731,885
U.S. Possessions, total	348,305	15,715	332,590	463,440	23,926	439,514
Virgin Islands, U.S.	352,235	5,495	346,740	403,808	17,235	386,573
Other U.S. Possessions	-3,930	10,219	-14,150	59,632	6,690	52,942
Other country or unknown	* 1,119	* 206	* 913	* 2,804	* 14	* 2,789
OPEC countries, total (countries included above)	4,738,595	1,007,070	3,731,524	5,246,705	999,286	4,247,419

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
	(12)	(13)	(14)	(15)	(16)
All geographic regions	135,230,421	91,424,129	43,806,293	46,638,623	47,794,506
Latin America, total	8,405,479	7,428,261	977,218	3,146,785	1,198,538
Mexico	2,781,934	2,511,305	270,629	755,905	375,839
Central America and Caribbean countries, total	1,195,493	826,945	368,548	541,427	310,041
Costa Rica	270,604	264,588	6,016	250,781	34,431
Dominican Republic	* 7,982	* 7,941	* 40	* 7,893	6,903
El Salvador	106,093	99,004	* 7,089	64,664	8,383
Guatemala	44,991	44,536	* 456	* 13,101	* 2,182
Honduras	130,370	127,684	* 2,686	* 112,438	* 5,123
Panama (including Canal Zone)	607,198	256,459	350,740	* 76,169	252,327
Other Central American and Caribbean countries	* 28,255	* 26,732	* 1,522	* 16,380	* 692
South America, total	4,428,052	4,090,010	338,041	1,849,453	512,658
Argentina	368,731	332,057	36,674	116,165	51,184
Bolivia	* 18,715	* 16,741	* 1,975	* 702	* 12,261
Brazil	1,954,797	1,822,095	132,703	865,814	218,413
Chile	325,424	302,850	22,574	187,270	67,150
Colombia	103,527	92,442	11,086	66,773	15,397
Ecuador	52,738	52,689	* 48	24,382	* 278
Peru	39,489	39,172	* 316	26,535	32,898
Uruguay	79,187	18,160	* 61,027	15,516	49,441
Venezuela	1,467,625	1,395,987	71,638	532,856	59,790
Other South American countries	* 17,818	* 17,818	0	* 13,440	* 5,846
Other Western Hemisphere, total	37,747,897	25,698,664	12,049,233	17,465,319	13,351,278
Bahamas	490,230	223,589	266,640	198,316	640,597
Barbados	343,756	115,181	228,575	* 68,365	202,783
Bermuda	8,504,065	2,389,949	6,114,116	2,037,671	5,961,550
British Virgin Islands	771,656	* 87,695	683,961	* 85,142	277,128
Canada	23,233,939	20,173,519	3,060,420	13,459,200	4,066,343
Cayman Islands	4,195,904	2,640,809	1,555,095	1,575,608	2,077,842
Jamaica	* 2,509	* 2,172	* 337	* 2,042	* 611
Netherlands Antilles	130,298	15,123	* 115,174	* 11,602	97,685
Trinidad and Tobago	* 32,545	* 31,755	* 790	* 17,780	* 1,767
Other Western Hemisphere countries	42,995	* 18,871	* 24,124	* 9,592	24,973
Europe, total	66,473,533	41,197,097	25,276,436	18,844,540	26,506,188
European Union, total	58,594,038	39,269,485	19,324,552	17,795,692	22,789,759
Austria	218,115	205,998	12,117	110,204	67,855
Belgium	1,044,742	681,235	363,507	461,198	356,701
Cyprus	199,351	115,829	* 83,522	* 22,051	65,179
Czech Republic	321,261	177,790	* 143,471	91,692	152,375
Denmark	237,346	151,696	85,650	70,676	398,306
Estonia	* 5,846	* 5,846	0	* 111	0
Finland	127,799	97,624	30,175	39,829	47,839
Reunion)	4,348,845	3,529,684	819,161	1,139,646	842,512
Germany	3,832,979	3,005,476	827,503	886,322	1,016,965
Greece	207,339	146,303	* 61,036	51,633	71,534
Hungary	628,438	150,494	477,944	28,896	333,100
Ireland	8,775,730	6,612,906	2,162,824	5,123,253	3,464,728
Italy	1,632,413	1,292,970	339,444	412,393	612,490
Latvia	* 4,232	* 3,121	* 1,111	* 449	* 2,299
Lithuania	* 847	* 847	0	0	* 3,663
Luxembourg	3,516,688	931,904	2,584,784	791,018	3,138,324
Malta	* 19,643	* 4,195	* 15,448	* 1,257	* 1,563
Netherlands	10,958,126	5,773,073	5,185,052	2,525,737	5,924,095
Poland	795,802	744,248	51,553	394,049	88,418
Portugal (including Azores)	439,115	267,023	172,091	45,350	683,216
Slovakia	30,426	30,426	* 1	20,616	* 12,313

Footnotes at end of table.

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
	(12)	(13)	(14)	(15)	(16)
Slovenia	* 94,344	* 90,312	* 4,032	* 10,622	* 4,623
Spain (including Canary Islands)	2,857,068	1,966,083	890,985	1,026,537	790,161
Sweden	451,665	321,307	130,358	133,088	190,846
United Kingdom and Northern Ireland (including Gibraltar)	17,845,878	12,963,096	4,882,782	4,409,066	4,520,656
Other European countries, total	7,879,495	1,927,611	5,951,884	1,048,848	3,716,429
Guernsey	* 39,408	* 2,419	* 36,989	* 2,364	59,699
Jersey	194,002	* 14,700	* 179,302	* 7,771	336,080
Norway	681,304	630,141	51,163	546,936	32,603
Romania	41,485	35,029	* 6,455	22,167	* 4,605
Russia	284,510	267,153	* 17,357	52,223	* 10,554
Switzerland	6,558,563	915,849	5,642,715	384,310	3,187,457
Ukraine	* 18,132	* 17,222	* 910	* 16,520	* 353
Other European countries	62,091	45,097	* 16,993	16,556	85,078
Africa, total	1,407,019	832,262	574,757	464,781	295,445
North Africa, total	64,047	59,530	* 4,517	8,989	3,356
Egypt	30,932	30,881	* 51	* 7,699	* 2,884
Morocco	30,476	26,050	* 4,426	* 374	* 28
Other North African countries	* 2,639	* 2,600	* 39	* 916	* 444
East Africa, total	57,429	43,087	14,343	36,336	36,089
Mauritius	32,829	* 19,081	13,748	* 18,113	35,344
Other East African countries	24,601	24,006	* 595	* 18,223	* 745
West and Central Africa, total	780,608	266,135	514,473	234,029	198,875
Liberia	564,342	* 139,778	424,564	* 139,778	192,712
Nigeria	96,585	96,585	0	86,477	* 3,180
Other West and Central African countries	119,681	29,772	* 89,909	* 7,774	* 2,984
Southern Africa, total	504,935	463,510	41,424	185,428	57,125
South Africa	481,803	441,673	40,130	173,203	53,877
Other Southern African countries	23,131	21,837	* 1,294	* 12,224	3,249
Asia, total	15,825,246	12,421,041	3,404,204	5,088,491	5,054,909
Central, Northern, and Southwestern Asia, total	339,201	268,804	* 70,398	119,982	67,819
Turkey	323,633	253,235	* 70,398	105,490	67,791
countries	* 15,569	* 15,569	0	* 14,492	* 28
Middle East, total	199,914	186,443	13,471	91,780	145,615
Israel	105,940	103,873	* 2,067	41,432	106,279
United Arab Emirates	36,123	* 27,949	* 8,174	* 16,732	32,127
Other Middle East countries	57,852	54,622	* 3,230	33,617	7,209
Southern and Southeastern Asia, total	4,393,894	3,625,570	768,324	1,543,007	991,956
India	302,603	289,859	12,744	129,969	41,287
Indonesia	646,695	636,348	* 10,347	84,476	6,118
Malaysia	539,639	434,994	104,646	299,381	120,450
Pakistan	28,980	28,926	* 55	* 8,602	* 605
Philippines	811,651	772,212	39,440	203,068	60,788
Singapore	1,579,545	1,034,941	544,604	649,335	659,632
Thailand	441,712	386,351	55,361	163,300	102,703
Vietnam	* 4,838	* 4,796	* 42	* 50	0
Other Southern and Southeastern Asian countries	* 38,230	* 37,145	* 1,086	* 4,826	* 373
Eastern Asia, total	10,892,236	8,340,224	2,552,012	3,333,722	3,849,519
China	1,306,714	1,240,924	65,790	578,033	136,223
Hong Kong	2,693,780	1,349,933	1,343,847	628,374	1,203,973
Japan (including Okinawa and Ryukyu Islands)	5,034,687	4,221,352	813,334	1,288,008	2,186,605
South Korea	1,123,974	819,749	304,225	529,885	271,969
Taiwan	733,081	708,266	24,815	309,421	48,151
Other Eastern Asian countries	0	0	0	0	* 2,599

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Distributions out of earnings and profits			Dividends paid to controlling U.S. corporation	Total Subpart F income
	Total	Not previously taxed earnings and profits	Previously taxed earnings and profits		
	(12)	(13)	(14)	(15)	(16)
Oceania, total	4,763,480	3,426,669	1,336,811	1,349,177	1,205,061
Australia	3,837,066	3,091,935	745,131	1,195,208	531,878
New Zealand	731,353	329,631	401,723	151,278	181,471
Marshall Islands	* 182,587	0	* 182,587	0	483,406
Other countries of Oceania	* 12,474	* 5,103	* 7,371	* 2,692	* 8,307
Puerto Rico and U.S. Possessions, total	607,768	420,135	187,633	279,529	183,087
Puerto Rico	592,756	406,952	185,804	266,746	159,212
U.S. Possessions, total	15,012	13,183	* 1,829	12,782	23,875
Virgin Islands, U.S.	* 6,347	* 5,863	* 484	* 5,863	* 17,811
Other U.S. Possessions	8,665	* 7,320	* 1,345	* 6,919	* 6,065
Other country or unknown	0	0	0	0	0
OPEC countries, total (countries included above)	2,296,100	2,205,941	90,160	751,248	103,284

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Receipts by foreign corporations from:						
	All sources	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
All geographic regions	3,795,850,571	1,030,284,624	178,950,203	182,688,301	668,398,192	247,928	2,787,272,960
Latin America, total	289,817,056	75,211,112	13,791,258	19,817,605	41,592,288	9,962	215,349,710
Mexico	153,372,290	48,132,310	9,234,979	15,217,269	23,677,095	2,967	105,688,271
Central America and Caribbean countries, total	16,172,951	5,049,759	1,098,300	1,358,823	2,592,636	0	11,137,537
Costa Rica	3,027,837	1,344,171	703,625	217,379	423,167	0	1,689,165
Dominican Republic	1,440,764	108,899	* 6,594	92,707	9,599	0	1,332,125
El Salvador	1,820,153	446,027	40,858	53,839	351,330	0	1,374,126
Guatemala	2,628,853	543,720	46,706	52,340	444,674	0	2,091,156
Honduras	1,937,940	935,441	262,420	246,129	426,892	0	1,002,854
Panama (including Canal Zone)	4,899,353	1,591,627	19,930	648,380	923,317	0	3,309,932
Other Central American and Caribbean countries	418,052	79,874	* 18,168	* 48,050	13,656	0	338,178
South America, total	120,271,814	22,029,043	3,457,978	3,241,512	15,322,557	* 6,995	98,523,902
Argentina	20,457,604	5,514,841	775,797	490,398	4,248,646	0	14,949,927
Bolivia	477,300	149,985	* 167	4,387	145,430	0	328,600
Brazil	58,858,281	8,722,499	1,042,084	1,618,570	6,058,571	* 3,274	50,209,282
Chile	11,789,089	2,096,972	428,815	539,048	1,129,110	0	9,747,076
Colombia	7,774,699	1,107,304	167,464	98,457	841,383	0	6,672,050
Ecuador	2,476,128	608,383	217,803	25,182	365,398	0	1,867,950
Peru	3,127,021	784,458	15,704	229,573	539,180	0	2,445,058
Uruguay	2,204,335	583,699	14,589	46,003	523,107	0	1,621,475
Venezuela	11,896,056	1,797,932	795,555	189,263	809,394	* 3,721	10,133,958
Other South American countries	1,211,301	662,971	0	* 633	662,338	0	548,527
Other Western Hemisphere, total	699,167,565	206,678,969	82,296,435	61,090,594	63,232,494	59,446	494,929,786
Bahamas	13,866,726	2,183,265	* 761,899	546,301	875,065	0	11,685,369
Barbados	3,429,763	1,226,355	217,148	561,921	447,287	0	2,203,800
Bermuda	155,961,340	63,816,487	20,577,876	21,849,641	21,388,414	* 556	93,272,144
British Virgin Islands	17,749,464	7,819,198	4,187,265	746,898	2,885,341	* -305	9,938,998
Canada	421,174,846	110,435,243	49,487,612	34,853,496	26,034,939	59,196	311,869,294
Cayman Islands	81,568,359	20,523,344	6,906,323	2,405,100	11,211,921	0	61,204,509
Jamaica	897,820	32,988	* 953	* 22,161	* 9,874	0	864,832
Netherlands Antilles	2,917,620	305,745	12,564	26,155	267,027	0	2,615,392
Trinidad and Tobago	314,731	34,465	* 1,042	* 6,297	27,125	0	280,267
Other Western Hemisphere countries	1,286,896	301,879	143,754	72,625	85,500	0	995,182
Europe, total	2,062,213,379	577,363,080	51,862,639	70,133,623	455,250,608	116,209	1,502,164,240
European Union, total	1,868,183,270	512,839,006	44,257,525	63,757,850	404,714,439	109,192	1,369,808,809
Austria	19,330,200	4,500,432	85,350	2,048,599	2,366,483	0	14,854,001
Belgium	53,634,950	20,077,197	575,590	1,415,692	18,085,087	* 828	34,073,215
Cyprus	1,388,524	129,768	* 14,048	* 2,387	113,332	0	1,258,981
Czech Republic	10,031,595	2,153,485	159,121	192,999	1,801,365	0	7,894,378
Denmark	15,208,077	3,062,447	209,191	325,875	2,527,381	0	12,197,625
Estonia	317,247	115,454	* 6,560	* 35,764	73,129	0	201,801
Finland	6,492,669	1,138,072	60,269	132,614	945,189	0	5,358,891
and Reunion)	153,028,917	44,451,688	3,370,170	3,991,846	37,085,624	* 4,047	109,272,764
Germany	223,960,105	70,117,716	4,985,316	4,265,138	60,867,108	* 154	157,160,843
Greece	6,811,221	545,073	17,382	30,020	497,671	0	6,266,713
Hungary	11,758,735	3,645,476	177,769	847,297	2,620,410	0	8,127,570
Ireland	103,788,860	34,574,821	5,798,356	6,352,173	22,424,292	0	70,557,593
Italy	72,388,907	11,283,613	1,043,896	886,805	9,352,883	* 29	61,221,640
Latvia	202,748	20,570	* 22	* 6	20,542	0	182,191
Lithuania	411,748	170,089	* 639	* 16,670	152,780	0	241,715
Luxembourg	157,504,240	33,585,792	1,157,099	2,039,648	30,319,644	* 69,401	124,102,150
Malta	491,037	84,494	* 836	* 364	* 83,249	* 46	406,713
Netherlands	297,741,740	114,387,233	6,846,748	16,494,212	91,029,652	* 16,621	185,483,223
Poland	18,551,896	4,414,450	236,421	140,359	4,037,670	0	14,175,413
Portugal (including Azores)	14,110,759	3,046,922	31,164	393,804	2,621,954	0	11,090,598
Slovakia	2,641,785	773,665	* 1,679	53,569	718,417	0	1,869,285

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Receipts by foreign corporations from:						
	All sources	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
Slovenia	924,802	349,159	* 7,327	2,898	338,934	0	575,643
Spain (including Canary Islands)	124,745,092	21,523,915	997,133	1,279,581	19,240,470	* 6,732	103,367,570
Sweden	43,963,634	19,869,639	4,789,314	421,062	14,656,004	* 3,260	24,174,602
United Kingdom and Northern Ireland (including Gibraltar)	528,753,781	118,817,834	13,686,126	22,388,468	82,735,166	* 8,074	415,693,693
Other European countries, total	194,030,109	64,524,074	7,605,115	6,375,773	50,536,169	* 7,017	132,355,431
Guernsey	402,259	72,424	0	* 3,876	68,549	0	332,680
Jersey	6,677,628	779,584	* 43,327	491,929	240,259	* 4,069	5,925,011
Norway	12,846,046	4,109,011	141,587	62,231	3,905,193	0	8,739,425
Romania	2,131,759	537,188	* 102,312	24,077	410,799	0	1,603,335
Russia	8,147,430	1,693,161	66,657	83,936	1,541,318	* 1,250	6,458,455
Switzerland	158,484,729	56,391,833	7,021,445	5,674,945	43,693,744	* 1,698	104,894,346
Ukraine	2,133,174	478,813	* 137,323	* 8,881	332,609	0	1,656,028
Other European countries	3,207,084	462,062	92,463	25,900	343,699	0	2,746,150
Africa, total	32,185,416	5,125,995	192,231	1,663,591	3,250,700	* 19,473	27,133,427
North Africa, total	3,315,831	663,327	* 1,412	83,047	578,869	0	2,654,839
Egypt	1,803,647	257,204	* 928	79,060	177,215	0	1,547,501
Morocco	1,021,743	308,162	* 483	* 313	307,366	0	713,580
Other North African countries	490,441	97,961	0	* 3,674	94,287	0	393,757
East Africa, total	3,341,112	715,053	21,016	356,472	318,092	* 19,473	2,643,969
Mauritius	1,930,671	531,501	* 20,825	292,293	198,910	* 19,473	1,411,469
Other East African countries	1,410,441	183,552	* 191	* 64,179	119,182	0	1,232,500
West and Central Africa, total	6,791,500	1,536,025	108,447	811,953	615,625	0	5,256,098
Liberia	3,014,292	1,091,884	* 108,384	741,176	242,324	0	1,922,550
Nigeria	1,656,448	60,919	* 3	44,666	16,251	0	1,595,979
Other West and Central African countries	2,120,760	383,222	* 61	* 26,110	357,051	0	1,737,570
Southern Africa, total	18,736,973	2,211,589	61,356	412,120	1,738,114	0	16,578,522
South Africa	17,521,365	1,852,984	60,993	410,021	1,381,970	0	15,719,788
Other Southern African countries	1,215,608	358,605	* 363	* 2,098	356,144	0	858,734
Asia, total	574,582,693	145,028,489	29,445,380	24,398,879	91,141,795	42,435	430,183,746
Central, Northern, and Southwestern Asia, total	17,251,629	5,620,463	8,170	63,786	5,548,507	0	11,631,586
Turkey	16,734,751	5,600,316	5,314	63,435	5,531,568	0	11,134,854
countries	516,878	20,147	* 2,856	* 351	* 16,939	0	496,732
Middle East, total	13,573,162	5,251,478	3,005,686	602,564	1,641,869	* 1,359	8,375,643
Israel	10,899,661	4,646,575	2,959,996	507,076	1,179,503	0	6,298,194
United Arab Emirates	1,324,706	392,145	44,909	* 58,594	288,641	0	941,413
Other Middle East countries	1,348,795	212,758	781	36,893	173,726	* 1,359	1,136,036
Southern and Southeastern Asia, total	171,241,854	54,795,367	12,312,733	13,221,440	29,254,381	* 6,813	116,740,303
India	16,996,271	5,586,476	1,714,881	1,585,225	2,285,794	* 577	11,443,140
Indonesia	7,237,821	2,618,258	150,382	1,794,926	672,950	0	4,646,699
Malaysia	20,876,512	11,581,231	4,023,098	2,695,760	4,862,372	0	9,340,022
Pakistan	696,233	25,795	* 598	* 1,633	23,564	0	670,437
Philippines	11,256,018	5,208,097	2,155,732	292,870	2,759,355	* 140	6,200,749
Singapore	90,352,458	22,866,394	4,115,192	4,725,156	14,025,316	* 730	67,518,552
Thailand	22,942,053	6,804,046	134,192	2,118,669	4,545,819	* 5,366	16,141,236
Vietnam	430,472	25,387	* 7,405	* 87	17,895	0	405,085
Other Southern and Southeastern Asian countries	454,017	79,682	* 11,251	* 7,114	61,318	0	374,382
Eastern Asia, total	372,516,049	79,361,181	14,118,791	10,511,089	54,697,038	34,263	293,436,214
China	48,118,616	17,377,196	4,742,300	1,701,476	10,929,034	* 4,387	30,792,926
Hong Kong	52,176,026	12,865,167	2,422,512	3,930,713	6,511,882	* 61	39,442,249
Japan (including Okinawa and Ryukyu Islands)	199,289,733	40,086,166	3,999,296	2,829,778	33,248,301	* 8,790	159,276,870
South Korea	44,396,044	4,256,175	993,586	496,549	2,745,017	* 21,024	40,159,184
Taiwan	27,409,364	4,110,160	1,919,362	1,099,458	1,091,339	* 1	23,305,010
Other Eastern Asian countries	1,126,266	666,317	* 41,735	* 453,115	* 171,466	0	459,976

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Receipts by foreign corporations from:						
	All sources	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(17)	(18)	(19)	(20)	(21)	(22)	(23)
Oceania, total	118,773,853	15,931,179	1,153,474	2,454,736	12,322,565	* 403	103,164,503
Australia	102,982,038	14,475,708	1,019,550	2,275,332	11,180,423	* 403	88,779,687
New Zealand	14,586,170	1,311,042	121,683	137,612	1,051,747	0	13,323,599
Marshall Islands	893,462	19,680	0	* 13	19,667	0	873,782
Other countries of Oceania	312,183	124,749	* 12,241	* 41,780	70,728	0	187,434
Puerto Rico and U.S. Possessions, total	19,060,268	4,945,801	208,786	3,129,274	1,607,742	0	14,297,206
Puerto Rico	17,189,828	4,830,928	121,932	3,124,428	1,584,568	0	12,541,236
U.S. Possessions, total	1,870,440	114,873	* 86,854	* 4,845	23,174	0	1,755,970
Virgin Islands, U.S.	935,662	23,027	* 3,155	* 2,670	17,201	0	912,825
Other U.S. Possessions	934,778	91,846	* 83,699	* 2,175	5,973	0	843,146
Other country or unknown	* 50,343	0	0	0	0	0	* 50,343
OPEC countries, total (countries included above)	23,172,918	5,028,182	991,350	2,087,750	1,945,361	* 3,721	18,217,876

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Payments by foreign corporations to:						
	All recipients	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
All geographic regions	3,528,629,281	1,075,521,968	234,870,915	224,166,893	615,661,945	822,216	2,482,722,738
Latin America, total	270,407,700	65,041,131	15,160,062	18,418,194	31,396,143	66,731	205,963,029
Mexico	141,811,822	38,544,627	9,317,264	12,129,978	17,039,841	57,544	103,548,445
Central America and Caribbean countries, total	15,282,787	5,162,648	1,124,499	1,726,378	2,311,771	0	10,203,547
Costa Rica	2,955,755	945,225	318,664	328,248	298,313	0	2,012,412
Dominican Republic	1,046,075	146,191	65,123	51,680	29,389	0	900,405
El Salvador	1,786,639	743,033	49,091	332,116	361,826	0	1,046,347
Guatemala	2,443,378	683,151	101,449	238,329	343,374	0	1,762,413
Honduras	1,954,411	769,841	188,356	375,738	205,748	0	1,218,913
Panama (including Canal Zone)	4,713,752	1,805,382	380,656	375,085	1,049,641	0	2,950,032
Other Central American and Caribbean countries	382,777	69,825	21,162	25,182	23,481	0	313,024
South America, total	113,313,091	21,333,856	4,718,299	4,561,838	12,044,531	9,187	92,211,037
Argentina	19,479,859	3,637,998	654,971	606,130	2,375,322	* 1,575	15,890,970
Bolivia	451,778	49,969	* 2,314	6,616	41,018	* 20	401,810
Brazil	56,589,172	8,751,578	2,311,860	2,154,116	4,284,936	* 665	47,857,978
Chile	10,497,079	2,289,384	382,942	580,094	1,325,776	* 572	8,338,512
Colombia	7,322,342	1,263,062	250,341	249,609	762,119	* 993	6,060,911
Ecuador	2,353,782	551,457	54,922	113,940	382,595	0	1,802,811
Peru	2,644,319	432,059	65,922	123,832	240,970	* 1,335	2,225,179
Uruguay	2,186,487	1,029,481	97,622	122,851	808,998	* 10	1,160,288
Venezuela	10,629,900	3,143,525	878,642	600,079	1,660,816	* 3,988	7,499,552
Other South American countries	1,158,371	185,342	* 18,763	4,570	161,981	* 28	973,029
Other Western Hemisphere, total	651,033,424	188,194,599	67,966,341	59,129,414	61,030,647	68,197	466,404,850
Bahamas	11,051,239	4,778,810	208,934	2,157,290	2,412,585	0	6,276,895
Barbados	3,184,948	1,064,057	244,816	239,970	579,271	0	2,131,013
Bermuda	136,596,478	45,065,848	12,559,971	14,172,180	18,333,413	* 285	92,961,034
British Virgin Islands	15,078,607	6,377,997	4,030,138	528,022	1,819,838	0	8,726,352
Canada	407,512,520	102,781,380	36,559,882	36,768,502	29,385,230	67,766	305,660,346
Cayman Islands	74,047,844	27,159,300	14,286,329	4,895,337	7,977,567	* 67	48,044,933
Jamaica	843,826	54,796	* 21,564	13,543	* 19,688	0	789,228
Netherlands Antilles	1,112,604	553,666	32,798	133,011	387,856	0	568,435
Trinidad and Tobago	308,259	73,974	* 10,647	41,658	21,669	0	234,285
Other Western Hemisphere countries	1,297,099	284,772	11,262	179,901	93,528	* 80	1,012,327
Europe, total	1,907,338,693	586,247,068	90,464,620	94,395,240	401,100,620	286,588	1,339,727,663
European Union, total	1,729,747,870	517,449,971	74,590,261	82,926,560	359,655,400	277,751	1,226,734,245
Austria	18,051,285	4,446,642	138,927	1,228,910	3,078,805	0	13,621,149
Belgium	51,638,670	16,214,255	1,355,484	2,771,581	12,084,407	* 2,784	35,807,155
Cyprus	1,297,959	384,507	92,586	95,311	196,610	0	919,605
Czech Republic	9,422,563	2,452,616	130,557	288,253	2,033,806	0	6,998,392
Denmark	13,888,661	3,334,471	295,722	537,921	2,500,591	* 236	10,598,695
Estonia	307,816	60,601	* 3,792	* 1,281	55,528	0	247,216
Finland	6,035,469	1,860,040	103,465	194,865	1,561,710	0	4,184,384
Reunion)	147,628,793	38,963,570	3,667,445	4,935,315	30,351,431	* 9,379	108,996,238
Germany	219,294,714	52,565,955	5,812,405	7,007,324	39,743,089	* 3,136	167,074,630
Greece	6,532,310	1,777,282	62,835	131,466	1,582,981	0	4,761,153
Hungary	10,847,573	3,184,851	139,641	376,840	2,668,370	0	7,685,780
Ireland	90,956,731	47,249,004	24,373,117	4,692,869	18,183,018	0	53,754,012
Italy	69,286,514	21,588,343	1,033,797	2,531,557	18,019,205	* 3,784	47,722,396
Latvia	190,333	66,207	* 7,144	* 3,875	55,188	0	124,127
Lithuania	369,157	88,780	* 250	* 2,455	86,075	0	283,753
Luxembourg	142,336,281	40,696,782	1,972,984	8,775,155	29,903,695	* 44,947	102,618,808
Malta	465,805	61,842	* 15,462	* 5,157	35,793	* 5,431	404,907
Netherlands	257,789,511	93,293,909	16,462,607	16,074,250	60,631,292	* 125,760	165,155,813
Poland	17,694,798	4,664,416	412,692	721,958	3,529,766	0	13,099,114
Portugal (including Azores)	11,499,743	3,613,690	82,862	719,590	2,810,462	* 776	7,968,565
Slovakia	2,507,460	454,876	51,551	55,237	348,087	0	2,052,841

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Payments by foreign corporations to:						
	All recipients	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
Slovenia	935,458	317,629	* 40,392	* 33,094	244,143	0	617,829
Spain (including Canary Islands)	118,328,977	32,753,492	2,181,300	2,825,740	27,732,159	* 14,294	85,628,288
Sweden	42,562,757	14,784,415	1,157,850	936,918	12,683,680	* 5,967	27,974,852
United Kingdom and Northern Ireland (including Gibraltar)	489,878,532	132,571,796	14,995,395	27,979,636	89,535,509	61,256	358,434,542
Other European countries, total	177,590,823	68,797,097	15,874,359	11,468,681	41,445,220	8,837	112,993,418
Guernsey	292,524	84,673	* 2,945	* 31,063	50,664	0	210,423
Jersey	4,942,259	756,413	* 64,844	234,174	457,395	0	4,189,710
Norway	10,433,587	2,669,853	771,800	251,250	1,646,803	0	7,780,724
Romania	1,998,879	490,069	30,057	16,808	443,204	0	1,509,413
Russia	7,599,313	3,325,939	122,823	181,160	3,020,036	* 1,921	4,341,023
Switzerland	147,152,394	60,543,000	14,823,110	10,676,900	35,036,363	* 6,627	90,703,672
Ukraine	1,997,904	450,722	* 29,397	* 23,973	397,073	* 279	1,547,406
Other European countries	3,173,964	476,427	29,382	53,353	393,682	* 10	2,711,049
Africa, total	30,787,269	9,376,361	1,896,529	2,330,920	5,038,043	* 110,868	22,364,287
North Africa, total	3,239,451	588,412	56,263	39,422	492,670	* 58	2,655,163
Egypt	1,723,273	332,300	18,870	23,456	289,975	0	1,393,855
Morocco	1,038,262	206,365	37,374	* 5,615	163,318	* 58	832,553
Other North African countries	477,915	49,747	* 19	* 10,351	39,377	0	428,755
East Africa, total	3,062,194	1,447,922	674,799	227,464	438,205	* 107,544	2,535,331
Mauritius	1,660,251	1,178,894	659,451	35,316	376,840	* 107,288	1,402,393
Other East African countries	1,401,943	269,028	15,348	192,148	61,365	* 167	1,132,938
West and Central Africa, total	6,951,663	2,098,529	412,618	703,733	982,178	0	4,856,905
Liberia	2,947,632	1,308,291	248,987	231,525	827,779	0	1,639,540
Nigeria	1,749,618	396,489	* 73,676	239,697	83,116	0	1,355,690
Other West and Central African countries	2,254,413	393,748	* 89,956	232,511	71,282	0	1,861,675
Southern Africa, total	17,533,961	5,241,497	752,849	1,360,302	3,124,990	* 3,357	12,316,888
South Africa	16,359,791	5,085,080	748,525	1,349,525	2,983,674	* 3,357	11,296,215
Other Southern African countries	1,174,171	156,417	* 4,324	10,777	141,316	0	1,020,673
Asia, total	542,158,215	198,291,065	54,920,034	42,435,467	100,655,351	280,213	349,439,089
Central, Northern, and Southwestern Asia, total	16,302,147	6,886,364	241,371	172,516	6,472,477	0	9,449,060
Turkey	15,857,430	6,830,851	236,081	145,448	6,449,323	0	9,059,856
countries	444,717	55,513	* 5,290	* 27,069	23,154	0	389,204
Middle East, total	12,571,193	2,456,920	831,088	249,320	1,374,336	2,176	10,381,804
Israel	10,095,065	1,711,791	651,934	165,771	893,979	* 107	8,646,388
United Arab Emirates	1,172,984	498,021	125,016	34,857	336,493	* 1,654	676,352
Other Middle East countries	1,303,143	247,108	54,138	48,691	143,865	* 415	1,059,065
Southern and Southeastern Asia, total	161,160,591	63,270,161	19,267,995	19,376,923	24,504,102	121,141	100,570,175
India	15,073,238	2,690,648	430,877	516,726	1,742,745	* 300	12,507,234
Indonesia	6,380,038	1,488,018	147,996	180,327	1,159,695	0	4,896,526
Malaysia	19,627,392	8,588,303	2,325,203	2,438,255	3,822,781	* 2,065	11,075,107
Pakistan	623,182	144,616	21,407	32,617	90,592	0	480,470
Philippines	10,930,061	5,487,673	3,102,799	900,619	1,483,852	* 404	5,542,554
Singapore	85,987,307	40,323,397	12,812,563	14,500,540	12,911,394	* 98,899	48,041,231
Thailand	21,653,304	4,392,413	402,201	762,971	3,215,620	* 11,621	17,288,088
Vietnam	426,389	52,996	14,298	13,722	24,831	* 144	373,393
Other Southern and Southeastern Asian countries	459,680	102,097	10,651	31,146	52,592	* 7,708	365,573
Eastern Asia, total	352,124,284	125,677,620	34,579,580	22,636,707	68,304,437	156,897	229,038,050
China	44,933,020	13,861,122	3,035,555	1,735,522	8,985,696	104,349	31,183,563
Hong Kong	48,577,234	18,805,677	4,604,812	3,658,522	10,542,343	0	30,038,255
Japan (including Okinawa and Ryukyu Islands)	190,808,277	73,144,561	21,154,240	12,187,491	39,795,960	* 6,870	119,720,971
South Korea	40,807,706	12,007,199	2,412,363	4,128,057	5,426,022	* 40,758	28,839,380
Taiwan	25,947,478	7,771,101	3,331,902	908,481	3,525,797	* 4,920	18,293,274
Other Eastern Asian countries	1,050,569	87,961	* 40,708	* 18,634	* 28,619	0	962,607

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 2. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Related Party Transactions, by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation of Controlled Foreign Corporation	Controlled Foreign Corporations—continued						
	Payments by foreign corporations to:						
	All recipients	All related parties, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporations controlled by U.S. corporation filing return	All other related parties	Unrelated parties
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
Oceania, total	110,192,216	24,081,405	3,864,758	4,469,991	15,737,038	* 9,618	86,361,615
Australia	95,934,951	20,540,432	3,534,801	3,586,125	13,411,134	* 8,372	75,576,737
New Zealand	13,495,763	3,254,983	322,258	805,326	2,126,153	* 1,246	10,308,427
Marshall Islands	502,416	204,535	* 6	61,417	143,112	0	298,732
Other countries of Oceania	259,086	81,455	* 7,693	17,123	56,639	0	177,718
Puerto Rico and U.S. Possessions, total	16,661,978	4,290,124	598,356	2,987,666	704,102	0	12,412,633
Puerto Rico	15,051,187	4,079,454	502,564	2,926,794	650,096	0	11,008,040
U.S. Possessions, total	1,610,791	210,670	95,792	60,872	54,006	0	1,404,592
Virgin Islands, U.S.	671,690	105,842	43,940	38,949	22,953	0	565,937
Other U.S. Possessions	939,101	104,828	51,852	21,922	31,053	0	838,655
Other country or unknown	* 49,788	* 216	* 216	0	0	0	* 49,572
OPEC countries, total (countries included above)	20,966,683	5,755,504	1,277,272	1,102,224	3,370,072	5,936	15,235,829

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

[1] Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one country.

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

Controlled Foreign Corporations, 2004

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations		
		Number of foreign corporations	Total assets	
			Beginning-of-year	End-of-year
	(1)	(2)	(3)	(4)
ALL GEOGRAPHIC REGIONS [2]				
All industries	10,939	74,676	7,613,683,688	9,217,097,520
Raw materials and energy production	574	2,744	308,810,919	326,367,994
Goods production	3,912	19,359	1,596,395,081	1,865,827,173
Distribution and transportation of goods	3,348	16,215	540,946,198	620,621,547
Information	743	3,740	176,746,514	289,705,068
Finance, insurance, real estate, and rental and leasing	1,664	8,743	3,189,714,638	3,919,933,672
Services	4,693	23,418	1,799,886,561	2,193,185,896
ARGENTINA [2]				
All industries	529	861	17,639,305	19,522,148
Raw materials and energy production	38	71	3,663,160	4,005,238
Goods production	158	208	5,268,313	6,042,530
Distribution and transportation of goods	143	164	3,660,721	3,785,391
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	85	144	2,644,178	2,877,122
Services	134	211	1,479,429	1,623,060
AUSTRALIA [2]				
All industries	1,325	2,807	195,769,614	260,959,465
Raw materials and energy production	59	170	15,725,696	20,726,357
Goods production	375	577	29,507,047	32,643,876
Distribution and transportation of goods	381	527	9,013,393	11,078,442
Information	98	193	7,536,549	9,738,320
Finance, insurance, real estate, and rental and leasing	111	345	85,876,477	116,800,505
Services	540	981	48,084,673	69,908,152
AUSTRIA [2]				
All industries	362	515	17,804,638	22,445,328
Raw materials and energy production	5	7	* 211,800	* 235,344
Goods production	96	120	5,406,060	8,760,904
Distribution and transportation of goods	145	174	2,482,800	2,587,285
Information	18	30	218,193	200,742
Finance, insurance, real estate, and rental and leasing	19	31	3,174,847	3,051,765
Services	111	148	6,286,573	7,587,950
BAHAMAS				
All industries	93	384	42,451,711	52,616,671
Raw materials and energy production	17	206	14,401,803	19,417,528
Goods production	d	d	d	d
Distribution and transportation of goods	25	45	2,785,694	4,186,097
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	26	41	9,934,101	9,433,829
Services	34	70	13,255,058	17,677,028
BELGIUM [2]				
All industries	711	1,281	85,105,269	95,580,427
Raw materials and energy production	9	10	79,676	86,661
Goods production	237	361	28,585,698	31,360,438
Distribution and transportation of goods	253	339	10,211,596	10,456,925
Information	34	54	1,272,633	1,668,546
Finance, insurance, real estate, and rental and leasing	47	90	28,163,096	32,675,179
Services	265	424	16,770,193	19,308,628
BERMUDA [2]				
All industries	450	974	403,544,887	467,439,769
Raw materials and energy production	20	157	23,009,085	27,272,875
Goods production	38	45	52,846,269	94,364,534
Distribution and transportation of goods	40	49	11,326,956	14,331,644
Information	7	7	* 352,608	* 352,919
Finance, insurance, real estate, and rental and leasing	292	458	137,211,596	121,776,427
Services	148	253	178,798,274	209,339,959

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations		
		Number of foreign corporations	Total assets	
			Beginning-of-year	End-of-year
	(1)	(2)	(3)	(4)
BRAZIL [2]				
All industries	971	1,677	84,392,775	94,877,634
Raw materials and energy production	41	81	12,086,606	12,958,652
Goods production	344	505	22,670,996	26,856,653
Distribution and transportation of goods	284	353	8,206,479	7,724,068
Information	62	102	7,738,811	7,662,076
Finance, insurance, real estate, and rental and leasing	65	145	22,945,191	28,510,693
Services	329	484	10,737,434	11,155,167
CANADA [2]				
All industries	3,592	6,559	648,656,325	742,560,256
Raw materials and energy production	126	266	89,322,196	90,619,150
Goods production	1,125	1,643	179,814,507	202,780,255
Distribution and transportation of goods	1,333	1,797	57,241,835	64,293,165
Information	148	254	7,048,390	7,814,568
Finance, insurance, real estate, and rental and leasing	370	720	221,251,417	266,999,579
Services	1,169	1,849	93,908,391	109,949,068
CAYMAN ISLANDS [2]				
All industries	548	1,402	344,461,974	426,218,389
Raw materials and energy production	45	211	27,559,364	30,402,044
Goods production	81	103	26,182,478	28,414,267
Distribution and transportation of goods	47	55	2,213,791	2,873,052
Information	8	8	* 21,984	* 20,907
Finance, insurance, real estate, and rental and leasing	200	513	165,742,619	210,426,950
Services	249	504	122,715,928	154,043,998
CHILE [2]				
All industries	394	712	28,344,498	30,496,318
Raw materials and energy production	24	60	8,129,745	8,082,705
Goods production	103	127	2,647,349	2,911,944
Distribution and transportation of goods	157	188	1,853,988	2,173,178
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	48	87	6,620,363	7,879,826
Services	107	208	6,637,889	7,224,150
CHINA [2]				
All industries	1,161	2,264	28,663,251	38,208,863
Raw materials and energy production	14	21	98,955	98,528
Goods production	698	1,255	19,684,503	26,182,998
Distribution and transportation of goods	280	418	4,317,743	5,528,784
Information	29	38	81,009	168,598
Finance, insurance, real estate, and rental and leasing	31	43	414,623	609,607
Services	315	465	4,026,579	5,520,564
COLOMBIA [2]				
All industries	286	437	7,675,920	9,646,609
Raw materials and energy production	d	d	d	d
Goods production	76	96	2,027,818	2,563,499
Distribution and transportation of goods	84	94	888,973	1,147,457
Information	32	34	996,735	1,472,230
Finance, insurance, real estate, and rental and leasing	50	80	2,629,690	3,302,462
Services	64	108	1,056,591	1,109,432
CZECH REPUBLIC [2]				
All industries	323	476	14,477,848	16,107,208
Raw materials and energy production	d	d	d	d
Goods production	123	161	4,009,218	4,647,223
Distribution and transportation of goods	102	119	791,482	939,428
Information	14	23	247,122	214,273
Finance, insurance, real estate, and rental and leasing	25	37	5,896,173	6,674,395
Services	90	125	3,148,366	3,201,299

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations		
		Number of foreign corporations	Total assets	
			Beginning-of-year	End-of-year
	(1)	(2)	(3)	(4)
DENMARK [2]				
All industries	414	681	18,948,834	27,675,432
Raw materials and energy production	9	9	* 98,379	* 1,119,564
Goods production	116	140	6,846,449	9,386,827
Distribution and transportation of goods	145	170	2,282,350	2,446,397
Information	21	24	157,545	166,103
Finance, insurance, real estate, and rental and leasing	31	48	3,417,212	4,045,692
Services	161	286	6,099,687	10,468,431
FRANCE (incl. Corsica, Guadeloupe, Martinique, and Reunion) [2]				
All industries	1,603	3,857	251,795,752	267,209,715
Raw materials and energy production	23	39	1,807,210	1,715,705
Goods production	592	1,116	67,945,491	67,319,903
Distribution and transportation of goods	489	769	36,274,196	39,806,899
Information	101	217	7,878,229	7,543,176
Finance, insurance, real estate, and rental and leasing	130	334	69,548,659	73,794,207
Services	652	1,354	68,187,509	76,876,817
GERMANY [2]				
All industries	1,864	4,121	311,317,302	355,281,624
Raw materials and energy production	75	81	705,379	699,446
Goods production	638	1,160	127,044,952	143,018,313
Distribution and transportation of goods	604	913	28,467,896	33,376,042
Information	98	174	8,472,210	9,675,028
Finance, insurance, real estate, and rental and leasing	142	280	77,414,861	84,580,640
Services	787	1,476	69,079,524	83,821,687
HONG KONG [2]				
All industries	1,054	1,800	81,222,475	86,690,433
Raw materials and energy production	6	7	* 3,739,652	* 3,760,873
Goods production	240	314	4,790,742	6,171,410
Distribution and transportation of goods	398	548	11,449,788	10,683,244
Information	58	81	732,161	904,898
Finance, insurance, real estate, and rental and leasing	83	201	46,893,148	47,812,399
Services	415	637	13,609,364	17,342,558
HUNGARY [2]				
All industries	284	419	14,500,721	17,198,057
Raw materials and energy production	5	6	* 89,907	* 109,382
Goods production	99	122	6,735,036	8,245,645
Distribution and transportation of goods	86	100	612,445	929,236
Information	19	31	565,422	550,751
Finance, insurance, real estate, and rental and leasing	25	43	5,223,321	5,935,946
Services	82	114	1,274,560	1,427,048
INDIA [2]				
All industries	872	1,226	14,134,939	17,319,866
Raw materials and energy production	6	13	261,237	67,139
Goods production	229	311	6,021,227	7,185,814
Distribution and transportation of goods	123	147	1,244,220	1,566,882
Information	78	89	469,695	585,937
Finance, insurance, real estate, and rental and leasing	29	57	2,699,447	3,400,014
Services	480	601	3,425,905	4,496,243
IRELAND [2]				
All industries	607	1,091	208,775,353	315,222,046
Raw materials and energy production	7	7	* 28,299	* 17,601
Goods production	174	231	31,222,939	47,347,102
Distribution and transportation of goods	151	175	7,399,739	9,554,638
Information	42	52	8,201,964	17,625,534
Finance, insurance, real estate, and rental and leasing	130	313	101,567,134	167,397,925
Services	211	304	60,311,601	73,234,274

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations		
		Number of foreign corporations	Total assets	
			Beginning-of-year	End-of-year
	(1)	(2)	(3)	(4)
ISRAEL [2]				
All industries	795	993	18,890,558	20,784,509
Raw materials and energy production	d	d	d	d
Goods production	121	178	13,807,134	15,124,697
Distribution and transportation of goods	54	66	645,077	748,090
Information	145	150	246,920	182,778
Finance, insurance, real estate, and rental and leasing	16	31	674,302	524,731
Services	491	546	3,507,423	4,190,809
ITALY [2]				
All industries	998	1,795	85,896,332	99,292,730
Raw materials and energy production	17	25	281,106	307,431
Goods production	326	576	41,854,700	50,003,566
Distribution and transportation of goods	402	512	15,793,726	20,665,356
Information	54	79	1,923,378	2,423,952
Finance, insurance, real estate, and rental and leasing	51	131	12,409,621	12,183,035
Services	286	459	13,603,895	13,682,868
JAPAN (including Okinawa and Ryukyu Islands) [2]				
All industries	1,276	2,265	340,626,466	391,520,947
Raw materials and energy production	4	5	* 83,925	* 85,820
Goods production	344	534	50,290,493	54,445,017
Distribution and transportation of goods	443	600	28,850,415	33,670,423
Information	102	129	2,901,689	3,363,308
Finance, insurance, real estate, and rental and leasing	69	374	232,544,479	268,010,202
Services	466	618	25,913,054	31,918,932
LUXEMBOURG [2]				
All industries	260	439	415,606,232	568,027,649
Raw materials and energy production	d	d	d	d
Goods production	54	63	90,156,382	101,052,658
Distribution and transportation of goods	24	28	54,242,243	60,987,612
Information	11	12	702,286	700,951
Finance, insurance, real estate, and rental and leasing	61	151	104,887,541	150,197,789
Services	144	181	161,252,617	253,222,775
MALAYSIA [2]				
All industries	480	791	24,043,518	28,267,132
Raw materials and energy production	11	15	142,144	149,099
Goods production	178	252	9,410,219	9,828,262
Distribution and transportation of goods	139	189	1,130,695	1,219,346
Information	22	26	38,219	22,611
Finance, insurance, real estate, and rental and leasing	35	68	11,653,769	14,578,148
Services	164	236	1,651,822	2,454,397
MEXICO [2]				
All industries	2,249	4,618	199,333,766	243,119,233
Raw materials and energy production	160	215	5,223,590	6,492,763
Goods production	1,131	1,911	49,444,087	56,359,269
Distribution and transportation of goods	624	862	14,552,502	19,453,063
Information	74	181	2,456,500	2,455,850
Finance, insurance, real estate, and rental and leasing	173	375	90,515,622	110,125,013
Services	600	1,039	37,081,389	48,180,621
NETHERLANDS [2]				
All industries	1,371	3,151	647,998,050	809,568,942
Raw materials and energy production	39	68	5,197,732	6,814,034
Goods production	419	633	268,320,601	335,879,034
Distribution and transportation of goods	386	571	38,290,245	40,941,966
Information	93	173	26,334,901	84,719,450
Finance, insurance, real estate, and rental and leasing	145	265	88,355,684	85,154,392
Services	732	1,419	221,472,370	256,010,831

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations		
		Number of foreign corporations	Total assets	
			Beginning-of-year	End-of-year
	(1)	(2)	(3)	(4)
NEW ZEALAND [2]				
All industries	420	696	38,750,111	41,788,662
Raw materials and energy production	45	82	14,987,902	15,029,776
Goods production	108	137	12,670,694	13,632,945
Distribution and transportation of goods	137	171	2,345,931	2,691,630
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	34	83	5,871,627	7,215,747
Services	130	191	2,625,294	2,945,744
NORWAY [2]				
All industries	262	424	22,604,486	24,038,872
Raw materials and energy production	13	19	6,628,474	7,194,366
Goods production	69	81	9,552,997	9,285,760
Distribution and transportation of goods	103	127	3,496,564	3,793,194
Information	15	16	83,717	141,702
Finance, insurance, real estate, and rental and leasing	14	30	978,691	1,229,827
Services	81	147	1,861,852	2,381,988
PHILIPPINES [2]				
All industries	278	478	13,823,574	14,280,946
Raw materials and energy production	13	38	3,692,314	3,483,824
Goods production	107	134	4,210,211	4,304,501
Distribution and transportation of goods	77	98	618,963	633,449
Information	13	15	36,526	50,794
Finance, insurance, real estate, and rental and leasing	41	66	3,898,064	4,245,853
Services	91	124	1,365,331	1,560,027
POLAND				
All industries	400	650	23,609,142	28,109,245
Raw materials and energy production	11	13	113,061	183,443
Goods production	154	225	6,426,968	8,249,753
Distribution and transportation of goods	143	170	1,372,425	1,552,498
Information	15	26	353,206	330,333
Finance, insurance, real estate, and rental and leasing	26	60	14,501,523	16,666,892
Services	114	156	841,959	1,126,327
PORTUGAL (including Azores) [2]				
All industries	238	399	19,107,469	21,930,775
Raw materials and energy production	d	d	d	d
Goods production	78	101	4,066,877	4,668,997
Distribution and transportation of goods	87	124	1,919,819	2,371,164
Information	18	24	228,814	280,950
Finance, insurance, real estate, and rental and leasing	20	31	2,259,850	3,167,369
Services	72	112	10,565,471	11,425,855
PUERTO RICO [2]				
All industries	273	395	26,247,589	25,918,909
Raw materials and energy production	d	d	d	d
Goods production	62	74	7,188,321	8,824,163
Distribution and transportation of goods	96	123	4,572,066	2,415,194
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	37	68	6,345,869	6,475,911
Services	76	100	4,792,821	4,835,973
RUSSIA [2]				
All industries	239	441	4,975,878	6,120,600
Raw materials and energy production	d	d	d	d
Goods production	76	95	1,306,840	1,553,130
Distribution and transportation of goods	71	96	1,390,203	1,694,430
Information	16	100	902,540	1,006,812
Finance, insurance, real estate, and rental and leasing	16	20	283,732	378,132
Services	76	116	587,479	930,749

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations		
		Number of foreign corporations	Total assets	
			Beginning-of-year	End-of-year
	(1)	(2)	(3)	(4)
SINGAPORE [2]				
All industries	1,007	1,555	69,612,527	85,185,931
Raw materials and energy production	13	17	159,614	230,376
Goods production	281	351	16,788,959	19,638,155
Distribution and transportation of goods	322	424	10,848,560	13,021,651
Information	62	83	587,145	810,665
Finance, insurance, real estate, and rental and leasing	76	142	24,344,240	31,313,728
Services	406	531	16,867,130	20,147,797
SOUTH AFRICA [2]				
All industries	369	623	11,354,152	13,274,856
Raw materials and energy production	6	7	* 176,656	* 235,981
Goods production	143	201	5,835,679	7,029,307
Distribution and transportation of goods	115	150	1,265,958	1,616,541
Information	13	17	203,440	145,964
Finance, insurance, real estate, and rental and leasing	35	54	2,445,222	2,481,082
Services	110	189	1,403,383	1,762,406
SOUTH KOREA [2]				
All industries	560	757	44,175,322	100,196,395
Raw materials and energy production	5	7	* 1,914,910	* 2,160,370
Goods production	203	255	17,145,900	20,853,828
Distribution and transportation of goods	177	193	4,049,881	4,898,719
Information	23	31	1,006,506	1,843,639
Finance, insurance, real estate, and rental and leasing	32	75	18,124,490	68,063,716
Services	166	189	1,872,301	2,306,679
SPAIN (including Canary Islands) [2]				
All industries	846	1,640	121,387,014	135,498,522
Raw materials and energy production	21	31	635,650	600,962
Goods production	272	457	32,020,461	37,404,646
Distribution and transportation of goods	289	400	29,153,920	31,324,340
Information	63	98	1,337,130	1,634,803
Finance, insurance, real estate, and rental and leasing	53	129	19,959,245	22,909,565
Services	294	517	38,250,156	41,581,480
SWEDEN [2]				
All industries	592	1,055	65,788,559	72,202,182
Raw materials and energy production	4	4	* 19,940	* 18,579
Goods production	178	252	18,999,270	20,583,804
Distribution and transportation of goods	199	241	3,338,708	3,805,795
Information	42	64	4,204,467	4,317,132
Finance, insurance, real estate, and rental and leasing	31	60	18,336,880	18,943,435
Services	235	421	20,886,536	24,458,571
SWITZERLAND [2]				
All industries	753	1,389	302,337,653	326,515,781
Raw materials and energy production	6	6	* 265,256	* 330,792
Goods production	216	305	108,130,473	111,755,654
Distribution and transportation of goods	294	426	35,534,424	43,017,576
Information	45	64	2,582,789	4,474,209
Finance, insurance, real estate, and rental and leasing	75	129	66,308,382	66,755,964
Services	295	450	89,511,318	100,178,091
TAIWAN [2]				
All industries	396	539	36,076,030	44,649,995
Raw materials and energy production	d	d	d	d
Goods production	182	212	7,459,817	9,144,048
Distribution and transportation of goods	111	127	2,000,178	2,469,625
Information	11	14	43,304	46,684
Finance, insurance, real estate, and rental and leasing	21	52	24,494,355	30,803,024
Services	103	131	1,914,352	2,178,703

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Number of U.S. corporation returns [1]	Controlled Foreign Corporations		
		Number of foreign corporations	Total assets	
			Beginning-of-year	End-of-year
	(1)	(2)	(3)	(4)
THAILAND [2]				
All industries	398	663	16,117,776	18,710,822
Raw materials and energy production	11	18	583,924	560,636
Goods production	165	226	7,633,553	8,390,708
Distribution and transportation of goods	126	152	1,864,510	2,315,871
Information	12	15	141,477	164,222
Finance, insurance, real estate, and rental and leasing	30	89	4,667,130	5,864,695
Services	115	158	1,224,124	1,406,649
UNITED KINGDOM AND NORTHERN IRELAND (including Gibraltar) [2]				
All industries	3,721	8,227	1,972,807,487	2,443,427,749
Raw materials and energy production	61	135	28,700,337	24,745,525
Goods production	1,171	1,859	138,733,675	152,292,679
Distribution and transportation of goods	998	1,406	57,591,144	65,351,986
Information	233	555	65,407,889	100,407,140
Finance, insurance, real estate, and rental and leasing	532	1,411	1,333,186,120	1,697,318,873
Services	1,514	2,812	349,083,972	403,208,899
VENEZUELA [2]				
All industries	325	525	16,692,424	17,020,446
Raw materials and energy production	37	64	4,775,072	5,044,193
Goods production	113	145	5,601,604	6,263,067
Distribution and transportation of goods	92	120	1,031,890	1,582,042
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	29	44	1,214,324	1,505,912
Services	87	119	2,898,482	1,591,424
EUROPEAN UNION, TOTAL [2]				
All industries	5,574	30,810	4,294,596,320	5,319,004,566
Raw materials and energy production	189	463	43,065,548	39,208,191
Goods production	2,014	7,822	884,756,065	1,037,529,092
Distribution and transportation of goods	1,701	6,485	293,907,212	331,896,761
Information	381	1,685	127,848,307	233,065,171
Finance, insurance, real estate, and rental and leasing	831	3,490	1,891,693,471	2,388,823,099
Services	2,520	10,655	1,052,630,419	1,287,674,895
OPEC COUNTRIES, TOTAL [2]				
All industries	491	1,054	31,601,356	33,702,308
Raw materials and energy production	56	128	12,714,871	13,807,962
Goods production	178	294	7,704,632	8,262,854
Distribution and transportation of goods	148	236	2,125,694	2,967,477
Information	31	48	1,413,160	1,172,405
Finance, insurance, real estate, and rental and leasing	42	84	4,002,649	4,889,471
Services	149	253	3,634,259	2,576,855

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued			
	Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes
	(5)	(6)	(7)	(8)
ALL GEOGRAPHIC REGIONS [2]				
All industries	3,795,850,571	362,199,144	69,252,227	292,946,918
Raw materials and energy production	127,239,949	33,177,301	10,066,054	23,111,247
Goods production	1,633,118,266	125,146,203	22,297,868	102,848,335
Distribution and transportation of goods	966,617,230	52,504,462	11,643,824	40,860,638
Information	95,170,491	8,073,622	2,249,857	5,823,765
Finance, insurance, real estate, and rental and leasing	356,043,531	57,870,006	10,466,173	47,403,834
Services	616,353,220	85,462,899	12,510,316	72,952,583
ARGENTINA [2]				
All industries	20,457,604	1,050,672	314,653	736,019
Raw materials and energy production	1,355,401	185,003	61,272	123,731
Goods production	7,198,019	381,276	140,627	240,649
Distribution and transportation of goods	9,427,174	377,606	53,180	324,426
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	846,671	30,513	36,905	-6,393
Services	698,745	90,082	17,760	72,322
AUSTRALIA [2]				
All industries	102,982,038	12,341,006	2,439,551	9,901,456
Raw materials and energy production	5,386,287	104,775	147,724	-42,949
Goods production	40,443,046	3,747,975	973,316	2,774,659
Distribution and transportation of goods	15,868,669	903,692	241,437	662,255
Information	3,172,345	463,843	206,428	257,415
Finance, insurance, real estate, and rental and leasing	10,775,527	2,588,720	471,546	2,117,173
Services	27,288,370	4,532,276	398,780	4,133,496
AUSTRIA [2]				
All industries	19,330,200	1,290,770	391,061	899,709
Raw materials and energy production	* 126,815	* -1,982	* 2,180	* -4,162
Goods production	8,945,226	546,446	143,736	402,711
Distribution and transportation of goods	4,381,490	256,584	98,644	157,940
Information	221,839	-25,203	2,878	-28,081
Finance, insurance, real estate, and rental and leasing	397,759	-39,995	13,800	-53,795
Services	5,232,396	556,722	129,770	426,952
BAHAMAS				
All industries	13,866,726	3,002,336	850,231	2,152,105
Raw materials and energy production	3,102,572	1,108,951	471,095	637,856
Goods production	d	d	d	d
Distribution and transportation of goods	4,549,798	159,112	43,591	115,522
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	966,005	442,025	4,564	437,461
Services	2,188,948	978,151	321,840	656,312
BELGIUM [2]				
All industries	53,634,950	2,502,831	688,667	1,814,164
Raw materials and energy production	127,418	2,770	* 804	1,965
Goods production	28,458,839	919,993	219,788	700,205
Distribution and transportation of goods	14,332,566	247,145	109,798	137,347
Information	840,487	172,170	12,655	159,515
Finance, insurance, real estate, and rental and leasing	3,149,041	696,162	210,361	485,801
Services	6,716,616	463,760	134,745	329,015
BERMUDA [2]				
All industries	155,961,340	29,060,865	3,205,672	25,855,192
Raw materials and energy production	10,786,986	4,106,227	1,540,871	2,565,356
Goods production	59,382,856	12,050,214	459,075	11,591,139
Distribution and transportation of goods	26,357,875	1,383,207	200,260	1,182,946
Information	* 572	* 486	0	* 486
Finance, insurance, real estate, and rental and leasing	19,585,161	3,694,580	238,519	3,456,060
Services	39,847,359	7,826,178	766,946	7,059,231

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued			
	Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes
	(5)	(6)	(7)	(8)
BRAZIL [2]				
All industries	58,858,281	4,369,304	1,459,802	2,909,502
Raw materials and energy production	7,464,677	1,251,223	198,893	1,052,331
Goods production	29,389,098	2,622,187	717,169	1,905,018
Distribution and transportation of goods	9,581,936	523,239	132,039	391,200
Information	3,532,979	-119,800	36,627	-156,426
Finance, insurance, real estate, and rental and leasing	5,560,222	41,172	284,837	-243,665
Services	3,299,001	42,654	89,568	-46,914
CANADA [2]				
All industries	421,174,846	40,662,927	8,706,507	31,956,420
Raw materials and energy production	36,940,726	9,841,084	1,955,866	7,885,219
Goods production	204,709,521	12,261,408	2,784,142	9,477,265
Distribution and transportation of goods	116,112,765	4,477,159	1,580,184	2,896,975
Information	5,926,955	475,177	185,982	289,195
Finance, insurance, real estate, and rental and leasing	28,379,999	6,577,638	1,374,640	5,202,999
Services	29,034,472	7,023,964	823,516	6,200,448
CAYMAN ISLANDS [2]				
All industries	81,568,359	10,598,544	2,510,354	8,088,190
Raw materials and energy production	9,310,827	3,162,323	1,480,697	1,681,626
Goods production	33,948,678	2,576,940	185,688	2,391,252
Distribution and transportation of goods	2,990,740	315,927	23,770	292,157
Information	* 29,683	* 6,738	* 1,663	* 5,074
Finance, insurance, real estate, and rental and leasing	21,136,764	2,475,040	434,762	2,040,278
Services	14,147,909	2,064,817	383,774	1,681,043
CHILE [2]				
All industries	11,789,089	1,152,041	138,031	1,014,010
Raw materials and energy production	3,079,730	654,266	65,366	588,900
Goods production	2,554,106	178,922	21,523	157,399
Distribution and transportation of goods	2,963,038	124,067	18,764	105,304
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	1,350,304	103,075	13,467	89,608
Services	848,230	88,707	14,444	74,263
CHINA [2]				
All industries	48,118,616	4,334,383	539,739	3,794,644
Raw materials and energy production	80,312	-37	* 915	-952
Goods production	32,701,989	3,384,692	355,478	3,029,214
Distribution and transportation of goods	9,941,343	566,095	85,268	480,828
Information	80,422	5,751	848	4,903
Finance, insurance, real estate, and rental and leasing	172,675	25,618	2,978	22,640
Services	5,092,544	350,065	94,103	255,962
COLOMBIA [2]				
All industries	7,774,699	419,031	174,076	244,956
Raw materials and energy production	d	d	d	d
Goods production	3,168,221	224,331	79,133	145,198
Distribution and transportation of goods	2,689,553	138,706	39,535	99,171
Information	719,209	-119,014	3,739	-122,753
Finance, insurance, real estate, and rental and leasing	719,731	155,164	42,037	113,127
Services	357,670	21,700	8,570	13,130
CZECH REPUBLIC [2]				
All industries	10,031,595	929,152	246,742	682,410
Raw materials and energy production	d	d	d	d
Goods production	6,343,067	574,452	145,396	429,056
Distribution and transportation of goods	1,822,942	98,231	38,035	60,197
Information	213,552	30,850	4,335	26,515
Finance, insurance, real estate, and rental and leasing	807,467	156,693	38,595	118,098
Services	674,163	49,663	17,770	31,893

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued			
	Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes
	(5)	(6)	(7)	(8)
DENMARK [2]				
All industries	15,208,077	1,053,031	255,864	797,166
Raw materials and energy production	* 142,935	* -4,364	* 4,365	* -8,730
Goods production	4,762,553	268,880	59,465	209,415
Distribution and transportation of goods	4,306,862	156,624	45,646	110,978
Information	127,988	-2,240	2,689	-4,929
Finance, insurance, real estate, and rental and leasing	954,205	155,476	27,095	128,381
Services	4,877,394	473,120	114,539	358,581
FRANCE (incl. Corsica, Guadeloupe, Martinique, and Reunion) [2]				
All industries	153,028,917	9,402,259	2,593,965	6,808,294
Raw materials and energy production	1,245,131	-55,283	24,758	-80,041
Goods production	69,744,251	3,064,678	834,102	2,230,577
Distribution and transportation of goods	40,349,324	2,992,753	813,376	2,179,377
Information	3,777,887	522,913	52,280	470,633
Finance, insurance, real estate, and rental and leasing	8,708,778	1,541,741	342,738	1,199,003
Services	29,063,399	1,334,580	522,654	811,925
GERMANY [2]				
All industries	223,960,105	8,306,081	2,934,185	5,371,896
Raw materials and energy production	357,266	37,328	* 5,400	31,929
Goods production	130,955,056	2,308,130	1,182,930	1,125,200
Distribution and transportation of goods	50,563,259	1,390,927	479,046	911,881
Information	5,432,087	91,184	131,476	-40,292
Finance, insurance, real estate, and rental and leasing	10,147,029	1,436,505	308,506	1,127,998
Services	26,347,286	3,040,650	824,446	2,216,205
HONG KONG [2]				
All industries	52,176,026	6,247,144	977,378	5,269,766
Raw materials and energy production	* 1,457,343	* 599,103	* 97,928	* 501,174
Goods production	9,207,084	618,757	71,759	546,998
Distribution and transportation of goods	21,654,782	1,696,437	244,574	1,451,863
Information	526,196	5,972	3,955	2,017
Finance, insurance, real estate, and rental and leasing	9,910,146	1,671,913	392,221	1,279,692
Services	9,403,784	1,653,826	166,444	1,487,382
HUNGARY [2]				
All industries	11,758,735	1,419,586	141,087	1,278,499
Raw materials and energy production	* 31,077	* 11,452	* 1,217	* 10,235
Goods production	8,068,065	955,013	53,113	901,901
Distribution and transportation of goods	1,563,647	82,549	32,246	50,304
Information	475,011	79,819	3,847	75,972
Finance, insurance, real estate, and rental and leasing	887,611	215,785	37,815	177,970
Services	733,321	75,006	12,851	62,155
INDIA [2]				
All industries	16,996,271	1,711,855	430,136	1,281,719
Raw materials and energy production	151,141	29,233	* 7,446	21,787
Goods production	7,191,119	609,122	231,150	377,972
Distribution and transportation of goods	2,567,133	151,837	62,044	89,794
Information	747,697	89,615	23,697	65,918
Finance, insurance, real estate, and rental and leasing	1,940,345	344,456	33,651	310,805
Services	4,389,000	492,157	72,026	420,132
IRELAND [2]				
All industries	103,788,860	21,691,134	1,619,842	20,071,292
Raw materials and energy production	* 24,593	* 4,905	* 35	* 4,870
Goods production	42,317,344	7,311,120	478,319	6,832,801
Distribution and transportation of goods	21,407,164	1,863,006	89,513	1,773,492
Information	8,022,658	2,438,681	178,000	2,260,681
Finance, insurance, real estate, and rental and leasing	9,821,736	1,607,382	239,277	1,368,105
Services	22,154,746	8,458,592	634,442	7,824,150

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued			
	Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes
	(5)	(6)	(7)	(8)
ISRAEL [2]				
All industries	10,899,661	676,371	177,893	498,478
Raw materials and energy production	d	d	d	d
Goods production	7,237,372	593,601	123,797	469,804
Distribution and transportation of goods	772,522	32,183	11,302	20,882
Information	190,091	-18,469	3,330	-21,800
Finance, insurance, real estate, and rental and leasing	147,096	-15,121	2,720	-17,842
Services	2,547,248	83,368	37,253	46,114
ITALY [2]				
All industries	72,388,907	4,655,594	1,992,530	2,663,064
Raw materials and energy production	184,167	31,971	13,968	18,003
Goods production	37,630,118	2,810,905	1,053,498	1,757,407
Distribution and transportation of goods	20,006,450	853,134	404,609	448,525
Information	1,516,555	24,103	31,489	-7,386
Finance, insurance, real estate, and rental and leasing	3,043,540	505,349	246,953	258,396
Services	9,992,321	429,304	241,438	187,866
JAPAN (including Okinawa and Ryukyu Islands) [2]				
All industries	199,289,733	15,104,588	4,975,602	10,128,986
Raw materials and energy production	* 84,109	* 18,072	* 7,412	* 10,659
Goods production	85,013,535	5,493,583	2,021,253	3,472,330
Distribution and transportation of goods	52,066,043	1,901,544	1,032,656	868,888
Information	3,452,678	582,908	217,377	365,531
Finance, insurance, real estate, and rental and leasing	28,343,863	4,498,515	851,578	3,646,937
Services	30,326,669	2,612,691	844,716	1,767,975
LUXEMBOURG [2]				
All industries	157,504,240	10,485,073	1,014,271	9,470,802
Raw materials and energy production	d	d	d	d
Goods production	27,036,927	1,513,814	390,665	1,123,149
Distribution and transportation of goods	78,556,751	4,740,818	43,916	4,696,902
Information	215,723	-16,748	* 3,264	-20,012
Finance, insurance, real estate, and rental and leasing	5,834,451	522,912	92,168	430,744
Services	44,857,078	3,653,779	457,505	3,196,274
MALAYSIA [2]				
All industries	20,876,512	1,728,052	251,829	1,476,223
Raw materials and energy production	213,814	15,864	* 1,501	14,362
Goods production	14,226,855	1,065,614	117,322	948,291
Distribution and transportation of goods	3,067,381	221,858	58,078	163,780
Information	64,391	7,840	* 1,809	6,030
Finance, insurance, real estate, and rental and leasing	767,832	186,383	51,568	134,815
Services	2,516,866	229,002	21,235	207,768
MEXICO [2]				
All industries	153,372,290	12,269,344	3,290,568	8,978,776
Raw materials and energy production	4,316,563	804,141	63,443	740,698
Goods production	81,542,528	4,419,507	1,500,993	2,918,514
Distribution and transportation of goods	34,618,126	1,963,011	583,583	1,379,428
Information	2,229,846	10,877	35,537	-24,661
Finance, insurance, real estate, and rental and leasing	14,853,623	3,417,981	786,638	2,631,343
Services	15,696,760	1,661,512	318,514	1,342,998
NETHERLANDS [2]				
All industries	297,741,740	41,675,726	4,694,757	36,980,968
Raw materials and energy production	2,509,439	805,812	199,492	606,320
Goods production	159,681,490	23,763,265	2,336,939	21,426,327
Distribution and transportation of goods	56,395,909	3,895,513	545,086	3,350,426
Information	10,784,562	768,979	186,539	582,440
Finance, insurance, real estate, and rental and leasing	7,746,104	2,302,802	342,038	1,960,764
Services	60,589,199	10,141,579	1,084,437	9,057,141

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued			
	Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes
	(5)	(6)	(7)	(8)
NEW ZEALAND [2]				
All industries	14,586,170	1,603,082	302,271	1,300,811
Raw materials and energy production	2,297,661	439,857	* 49,057	390,800
Goods production	5,508,565	462,570	75,968	386,602
Distribution and transportation of goods	3,955,149	213,290	84,102	129,187
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	744,269	359,314	54,943	304,371
Services	1,856,704	95,296	27,586	67,710
NORWAY [2]				
All industries	12,846,046	3,043,562	2,097,751	945,811
Raw materials and energy production	4,189,293	2,763,756	1,968,420	795,336
Goods production	2,827,636	179,464	37,239	142,225
Distribution and transportation of goods	3,425,723	69,853	40,908	28,945
Information	82,941	-9,725	* 63	-9,788
Finance, insurance, real estate, and rental and leasing	146,892	-22,002	* 1,489	-23,490
Services	2,161,593	61,909	49,599	12,310
PHILIPPINES [2]				
All industries	11,256,018	1,371,488	211,354	1,160,135
Raw materials and energy production	1,159,155	381,668	61,534	320,133
Goods production	6,967,193	314,439	81,476	232,963
Distribution and transportation of goods	1,105,798	60,382	27,295	33,088
Information	81,480	23,588	* 539	23,048
Finance, insurance, real estate, and rental and leasing	978,974	397,379	27,442	369,937
Services	960,352	193,800	13,067	180,733
POLAND				
All industries	18,551,896	1,558,708	330,082	1,228,626
Raw materials and energy production	144,608	12,330	* 475	11,855
Goods production	11,612,626	916,266	175,534	740,732
Distribution and transportation of goods	3,377,392	170,026	43,079	126,947
Information	336,010	30,261	6,770	23,490
Finance, insurance, real estate, and rental and leasing	2,179,029	341,321	76,388	264,932
Services	902,230	88,505	27,836	60,669
PORTUGAL (including Azores) [2]				
All industries	14,110,759	1,774,372	334,186	1,440,185
Raw materials and energy production	d	d	d	d
Goods production	6,532,074	386,105	94,664	291,442
Distribution and transportation of goods	2,767,421	265,499	42,229	223,270
Information	325,352	36,446	10,534	25,912
Finance, insurance, real estate, and rental and leasing	437,650	44,055	15,183	28,872
Services	4,015,492	1,042,485	171,314	871,171
PUERTO RICO [2]				
All industries	17,189,828	2,864,682	264,770	2,599,912
Raw materials and energy production	d	d	d	d
Goods production	5,143,374	1,689,866	60,038	1,629,828
Distribution and transportation of goods	6,951,693	652,485	92,249	560,236
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	1,514,051	299,310	64,496	234,815
Services	1,349,183	163,640	21,329	142,311
RUSSIA [2]				
All industries	8,147,430	1,036,076	237,618	798,458
Raw materials and energy production	d	d	d	d
Goods production	2,103,499	220,059	56,557	163,503
Distribution and transportation of goods	3,671,362	390,844	79,707	311,136
Information	972,915	255,258	60,427	194,831
Finance, insurance, real estate, and rental and leasing	166,477	22,231	2,157	20,074
Services	1,041,481	135,315	38,757	96,558

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued			
	Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes
	(5)	(6)	(7)	(8)
SINGAPORE [2]				
All industries	90,352,458	5,275,084	572,648	4,702,436
Raw materials and energy production	257,666	12,254	11,094	1,160
Goods production	21,690,723	1,902,035	177,801	1,724,234
Distribution and transportation of goods	49,003,605	1,083,752	147,502	936,250
Information	739,276	74,495	13,592	60,904
Finance, insurance, real estate, and rental and leasing	9,037,310	798,544	115,999	682,545
Services	9,578,735	1,404,652	106,042	1,298,611
SOUTH AFRICA [2]				
All industries	17,521,365	1,757,602	529,330	1,228,272
Raw materials and energy production	* 156,813	* 40,527	* 294	* 40,234
Goods production	12,171,403	945,815	333,879	611,937
Distribution and transportation of goods	2,557,050	288,998	79,105	209,892
Information	244,592	62,540	17,582	44,958
Finance, insurance, real estate, and rental and leasing	683,180	176,384	45,645	130,739
Services	1,677,262	254,466	52,826	201,640
SOUTH KOREA [2]				
All industries	44,396,044	4,413,650	1,111,827	3,301,823
Raw materials and energy production	* 945,951	* 84,558	* 13,044	* 71,514
Goods production	26,055,844	2,657,569	649,497	2,008,072
Distribution and transportation of goods	8,742,728	659,054	198,980	460,073
Information	1,436,139	165,965	88,528	77,437
Finance, insurance, real estate, and rental and leasing	3,402,486	586,068	94,669	491,399
Services	3,739,723	259,666	66,676	192,990
SPAIN (including Canary Islands) [2]				
All industries	124,745,092	8,440,005	3,328,322	5,111,683
Raw materials and energy production	436,073	62,389	11,142	51,247
Goods production	41,804,241	2,778,792	684,988	2,093,804
Distribution and transportation of goods	48,290,306	3,024,043	1,651,826	1,372,217
Information	1,700,006	161,102	54,933	106,169
Finance, insurance, real estate, and rental and leasing	3,219,649	406,357	102,419	303,938
Services	29,222,348	2,028,565	822,826	1,205,739
SWEDEN [2]				
All industries	43,963,634	1,973,261	265,576	1,707,685
Raw materials and energy production	* 21,892	* -119	* 249	* -368
Goods production	26,222,717	1,056,990	81,643	975,347
Distribution and transportation of goods	7,843,909	148,533	52,012	96,521
Information	1,405,344	23,737	4,456	19,281
Finance, insurance, real estate, and rental and leasing	1,792,725	737,933	56,489	681,443
Services	6,657,003	7,409	71,349	-63,940
SWITZERLAND [2]				
All industries	158,484,729	17,424,541	1,428,253	15,996,289
Raw materials and energy production	* 614,039	* 126,879	* 6,126	* 120,753
Goods production	49,470,498	5,086,714	583,233	4,503,480
Distribution and transportation of goods	58,333,136	5,036,028	393,739	4,642,289
Information	2,448,364	430,088	23,414	406,674
Finance, insurance, real estate, and rental and leasing	5,398,641	427,408	90,290	337,118
Services	42,210,707	6,319,408	331,395	5,988,013
TAIWAN [2]				
All industries	27,409,364	2,817,860	467,808	2,350,052
Raw materials and energy production	d	d	d	d
Goods production	12,043,591	1,379,606	232,471	1,147,135
Distribution and transportation of goods	4,621,953	336,993	95,383	241,610
Information	74,056	5,725	* 2,613	3,111
Finance, insurance, real estate, and rental and leasing	7,715,288	934,869	78,268	856,601
Services	2,932,458	163,263	59,156	104,107

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued			
	Total receipts	Current earnings and profits (less deficit) before income taxes	Income taxes	Current earnings and profits (less deficit) after income taxes
	(5)	(6)	(7)	(8)
THAILAND [2]				
All industries	22,942,053	1,838,068	281,564	1,556,504
Raw materials and energy production	289,786	142,311	* 57,395	84,917
Goods production	15,943,259	1,120,097	73,205	1,046,891
Distribution and transportation of goods	4,645,154	287,712	67,899	219,813
Information	48,152	4,507	* 901	3,605
Finance, insurance, real estate, and rental and leasing	907,432	140,665	51,730	88,935
Services	1,099,095	140,933	30,239	110,695
UNITED KINGDOM AND NORTHERN IRELAND (including Gibraltar) [2]				
All industries	528,753,781	37,552,518	7,226,661	30,325,858
Raw materials and energy production	11,482,098	2,832,520	608,526	2,223,994
Goods production	182,247,765	3,331,137	1,260,961	2,070,177
Distribution and transportation of goods	111,747,683	4,849,800	902,831	3,946,969
Information	23,814,225	470,628	356,978	113,650
Finance, insurance, real estate, and rental and leasing	107,183,549	15,735,025	2,300,960	13,434,065
Services	92,164,224	10,344,521	1,797,216	8,547,305
VENEZUELA [2]				
All industries	11,896,056	2,686,301	449,110	2,237,191
Raw materials and energy production	1,924,418	293,855	54,494	239,361
Goods production	5,230,882	1,318,479	223,005	1,095,474
Distribution and transportation of goods	2,048,814	259,968	50,664	209,304
Information	d	d	d	d
Finance, insurance, real estate, and rental and leasing	571,387	85,790	14,464	71,325
Services	1,025,631	523,734	26,207	497,528
EUROPEAN UNION, TOTAL [2]				
All industries	1,868,183,270	156,345,334	28,486,545	127,858,788
Raw materials and energy production	18,190,237	3,874,462	902,786	2,971,677
Goods production	801,161,293	53,035,213	9,343,918	43,691,294
Distribution and transportation of goods	474,360,272	25,556,909	5,552,716	20,004,193
Information	59,565,588	4,854,971	1,053,920	3,801,051
Finance, insurance, real estate, and rental and leasing	166,872,489	26,470,153	4,488,177	21,981,976
Services	347,335,473	42,575,596	7,135,294	35,440,302
OPEC COUNTRIES, TOTAL [2]				
All industries	23,172,918	4,738,595	1,007,070	3,731,524
Raw materials and energy production	6,023,481	1,666,654	426,207	1,240,446
Goods production	8,009,579	1,486,613	288,975	1,197,638
Distribution and transportation of goods	4,317,988	465,824	75,402	390,422
Information	1,194,190	182,537	81,212	101,324
Finance, insurance, real estate, and rental and leasing	1,450,675	313,701	77,694	236,007
Services	2,157,062	628,016	57,369	570,646

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	Current earnings and profits before income taxes	Income taxes			
	(9)	(10)	(11)	(12)	(13)
ALL GEOGRAPHIC REGIONS [2]					
All industries	432,572,981	67,997,857	135,230,421	46,638,623	47,794,506
Raw materials and energy production	38,092,670	9,955,655	15,990,632	8,410,113	932,091
Goods production	145,962,799	22,179,827	43,338,323	17,604,019	11,898,152
Distribution and transportation of goods	58,826,488	11,454,019	15,607,374	4,030,637	8,705,972
Information	12,847,072	2,133,474	7,182,894	4,305,580	678,604
Finance, insurance, real estate, and rental and leasing	71,341,733	10,020,332	21,287,176	3,317,628	13,505,475
Services	105,385,304	12,234,108	31,805,437	8,970,235	12,067,414
ARGENTINA [2]					
All industries	1,708,272	299,579	368,731	116,165	51,184
Raw materials and energy production	230,162	53,445	43,519	* 16,572	* 4,464
Goods production	676,789	140,162	133,462	52,226	8,263
Distribution and transportation of goods	408,191	52,983	* 115,967	* 10,129	10,534
Information	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	136,049	33,499	32,744	* 10,700	20,600
Services	145,371	15,752	43,040	* 25,496	* 5,603
AUSTRALIA [2]					
All industries	15,310,790	2,438,028	3,837,066	1,195,208	531,878
Raw materials and energy production	1,083,882	148,747	* 394,682	* 209,946	* 1,755
Goods production	3,962,931	974,879	1,080,524	270,632	115,393
Distribution and transportation of goods	1,170,704	244,072	114,066	80,773	37,796
Information	590,405	202,906	326,416	* 102,334	15,857
Finance, insurance, real estate, and rental and leasing	3,150,425	464,777	865,052	211,827	237,148
Services	5,349,847	402,327	1,056,327	319,696	123,903
AUSTRIA [2]					
All industries	1,562,637	384,204	218,115	110,204	67,855
Raw materials and energy production	* 5,486	* 1,963	* 4,756	* 4,721	* 124
Goods production	570,363	144,595	93,441	* 36,382	29,252
Distribution and transportation of goods	309,491	93,088	30,639	* 4,307	9,513
Information	14,244	2,799	* 47,587	* 47,599	* 2,104
Finance, insurance, real estate, and rental and leasing	56,490	13,851	* 12,546	0	* 105
Services	606,406	127,856	29,145	* 17,194	26,756
BAHAMAS					
All industries	4,052,899	841,934	490,230	198,316	640,597
Raw materials and energy production	1,976,822	467,206	* 123,948	* 99,533	* 197,128
Goods production	d	d	d	d	d
Distribution and transportation of goods	206,609	* 39,371	* 43,078	* 11,135	86,956
Information	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	449,300	* 4,376	* 231,737	* 75,759	205,636
Services	1,104,107	321,840	55,828	* 9,972	88,211
BELGIUM [2]					
All industries	3,560,441	731,072	1,044,742	461,198	356,701
Raw materials and energy production	* 4,333	* 802	* 3,966	* 3,931	0
Goods production	1,340,226	268,504	693,787	304,529	160,481
Distribution and transportation of goods	425,931	114,589	59,060	* 5,229	24,322
Information	283,860	11,799	* 6,841	* 5,202	* 4,267
Finance, insurance, real estate, and rental and leasing	853,694	207,669	99,892	* 5,663	113,181
Services	651,382	127,194	181,197	136,644	54,450
BERMUDA [2]					
All industries	30,886,332	3,176,103	8,504,065	2,037,671	5,961,550
Raw materials and energy production	4,463,458	1,530,950	1,554,290	1,313,734	49,423
Goods production	12,079,221	459,315	1,234,691	* 340,082	1,145,502
Distribution and transportation of goods	1,385,657	200,260	376,513	* 137,054	256,598
Information	* 1,038	0	0	0	* 112
Finance, insurance, real estate, and rental and leasing	4,186,392	238,028	4,010,540	12,437	3,156,161
Services	8,770,566	747,549	1,328,032	234,364	1,353,754

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	Current earnings and profits before income taxes	Income taxes			
	(9)	(10)	(11)	(12)	(13)
BRAZIL [2]					
All industries	6,358,952	1,328,099	1,954,797	865,814	218,413
Raw materials and energy production	1,345,275	198,187	620,338	* 68,777	30,172
Goods production	3,232,469	709,479	788,664	471,197	88,913
Distribution and transportation of goods	668,694	129,386	136,749	100,614	35,556
Information	172,789	35,422	* 22,658	* 7,210	* 2,377
Finance, insurance, real estate, and rental and leasing	578,582	177,102	334,094	201,340	34,805
Services	352,225	77,911	52,295	16,675	26,590
CANADA [2]					
All industries	46,224,825	8,995,772	23,233,939	13,459,200	4,066,343
Raw materials and energy production	10,654,401	1,988,558	7,501,191	4,066,525	71,944
Goods production	14,996,967	3,043,630	8,880,302	6,426,140	1,960,987
Distribution and transportation of goods	5,184,457	1,539,915	1,313,221	475,082	551,075
Information	606,153	193,796	119,908	71,936	38,053
Finance, insurance, real estate, and rental and leasing	6,779,359	1,323,940	1,628,349	483,808	400,847
Services	7,994,903	903,564	3,790,901	1,935,643	1,042,879
CAYMAN ISLANDS [2]					
All industries	14,345,118	2,421,210	4,195,904	1,575,608	2,077,842
Raw materials and energy production	3,661,131	1,406,570	* 331,787	* 326,817	65,624
Goods production	2,846,150	183,854	1,100,078	986,118	141,697
Distribution and transportation of goods	389,349	16,945	* 7,804	* 166	64,030
Information	* 8,949	* 1,663	0	0	* 1
Finance, insurance, real estate, and rental and leasing	3,195,156	427,349	983,196	34,511	1,434,708
Services	4,241,820	384,828	1,773,040	227,996	371,451
CHILE [2]					
All industries	1,536,758	127,335	325,424	187,270	67,150
Raw materials and energy production	729,172	65,098	126,495	* 43,126	* 3,899
Goods production	309,645	20,317	72,011	* 65,082	* 15,233
Distribution and transportation of goods	144,806	16,906	* 18,592	* 10,373	* 7,406
Information	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	139,873	13,488	* 33,910	* 20,963	22,202
Services	180,612	8,089	57,445	31,477	18,410
CHINA [2]					
All industries	5,235,719	525,269	1,306,714	578,033	136,223
Raw materials and energy production	5,129	* 915	* 3,767	* 356	0
Goods production	3,855,598	350,059	1,071,867	447,443	111,690
Distribution and transportation of goods	750,982	81,578	90,900	52,027	14,757
Information	18,014	652	0	0	* 206
Finance, insurance, real estate, and rental and leasing	36,037	* 2,774	* 10,278	* 9,854	* 343
Services	563,802	89,149	129,903	68,353	9,227
COLOMBIA [2]					
All industries	607,796	164,746	103,527	66,773	15,397
Raw materials and energy production	d	d	d	d	d
Goods production	248,349	75,126	49,240	35,876	* 2,790
Distribution and transportation of goods	147,924	39,095	27,475	24,167	* 4,503
Information	3,057	* 2,534	* 735	0	* 178
Finance, insurance, real estate, and rental and leasing	162,976	39,775	* 20,540	* 5,820	* 7,206
Services	40,344	7,372	5,176	* 720	* 719
CZECH REPUBLIC [2]					
All industries	1,035,511	241,166	321,261	91,692	152,375
Raw materials and energy production	d	d	d	d	d
Goods production	630,560	146,608	197,998	* 9,353	92,717
Distribution and transportation of goods	115,034	32,280	35,466	* 9,433	* 3,647
Information	36,559	4,380	* 12,661	* 162	* 36,973
Finance, insurance, real estate, and rental and leasing	163,275	37,683	* 65,291	* 69,751	* 322
Services	68,967	17,603	9,845	* 2,992	* 18,715

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	Current earnings and profits before income taxes	Income taxes			
	(9)	(10)	(11)	(12)	(13)
DENMARK [2]					
All industries	1,409,595	250,066	237,346	70,676	398,306
Raw materials and energy production	* 13,384	* 4,419	* 26,117	* 10,177	0
Goods production	376,848	59,955	98,367	* 36,919	42,698
Distribution and transportation of goods	180,670	45,300	29,111	* 13,438	10,916
Information	8,972	* 2,315	0	0	* 185
Finance, insurance, real estate, and rental and leasing	182,543	27,104	* 36,919	* 2,954	* 67,200
Services	640,068	108,915	46,831	* 7,188	277,306
FRANCE (incl. Corsica, Guadeloupe, Martinique, and Reunion) [2]					
All industries	14,059,756	2,463,041	4,348,845	1,139,646	842,512
Raw materials and energy production	27,011	15,894	* 2,694	* 2,628	* 1,476
Goods production	4,397,595	813,171	2,014,904	463,557	203,361
Distribution and transportation of goods	3,408,044	745,498	828,650	193,538	87,630
Information	1,158,551	44,412	35,841	* 1,437	16,963
Finance, insurance, real estate, and rental and leasing	1,831,718	337,948	270,876	* 27,196	367,959
Services	3,225,271	502,065	1,195,696	451,290	164,938
GERMANY [2]					
All industries	13,925,568	2,689,185	3,832,979	886,322	1,016,965
Raw materials and energy production	44,138	* 5,397	* 10,774	* 112	* 17,491
Goods production	5,597,394	1,120,646	1,696,336	166,543	526,336
Distribution and transportation of goods	2,093,137	467,572	624,275	282,202	84,554
Information	309,556	57,770	168,339	* 119,110	22,754
Finance, insurance, real estate, and rental and leasing	1,777,360	258,549	566,902	* 196,626	96,355
Services	4,094,203	776,915	766,353	121,730	269,475
HONG KONG [2]					
All industries	6,738,648	989,822	2,693,780	628,374	1,203,973
Raw materials and energy production	* 600,256	* 97,905	* 477,982	0	* 503
Goods production	691,334	71,097	275,619	72,187	121,786
Distribution and transportation of goods	1,877,238	255,716	746,596	118,925	645,679
Information	24,918	3,148	* 35,888	* 33,865	* 426
Finance, insurance, real estate, and rental and leasing	1,723,682	391,774	213,487	37,876	144,135
Services	1,818,647	169,684	944,208	365,521	290,027
HUNGARY [2]					
All industries	1,569,803	135,636	628,438	28,896	333,100
Raw materials and energy production	* 11,554	* 1,073	* 890	* 576	* 1,746
Goods production	1,062,084	48,201	542,478	* 2,383	282,170
Distribution and transportation of goods	95,177	32,101	24,502	* 22,426	* 539
Information	84,789	3,780	* 10,502	* 824	* 22,670
Finance, insurance, real estate, and rental and leasing	223,442	37,788	* 14,772	* 2,445	* 9,122
Services	92,757	12,694	* 35,294	* 243	* 16,853
INDIA [2]					
All industries	2,134,493	415,843	302,603	129,969	41,287
Raw materials and energy production	30,423	* 7,446	* 3,693	0	* 156
Goods production	844,404	225,324	150,287	88,866	11,342
Distribution and transportation of goods	189,799	60,012	41,189	* 2,989	1,195
Information	113,408	23,586	* 3,987	* 3,863	* 158
Finance, insurance, real estate, and rental and leasing	359,516	28,096	* 3,245	* 955	* 953
Services	596,539	71,256	100,201	33,296	27,482
IRELAND [2]					
All industries	24,780,059	1,600,975	8,775,730	5,123,253	3,464,728
Raw materials and energy production	* 6,106	* 35	0	0	0
Goods production	7,580,654	474,698	3,476,349	1,734,976	326,660
Distribution and transportation of goods	1,915,358	89,882	147,128	* 32,514	297,634
Information	2,596,558	175,379	* 3,463,312	* 3,165,365	* 146,044
Finance, insurance, real estate, and rental and leasing	3,798,851	239,450	711,898	* 145,841	1,636,810
Services	8,874,697	621,275	977,043	* 44,558	1,057,533

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	Current earnings and profits before income taxes	Income taxes			
	(9)	(10)	(11)	(12)	(13)
ISRAEL [2]					
All industries	1,218,951	165,824	105,940	41,432	106,279
Raw materials and energy production	d	d	d	d	d
Goods production	799,459	114,046	74,012	* 26,572	52,831
Distribution and transportation of goods	48,757	11,279	* 21,009	* 11,031	* 2,275
Information	18,387	3,332	0	0	* 983
Finance, insurance, real estate, and rental and leasing	23,261	2,720	* 819	0	* 882
Services	327,302	34,957	* 10,099	* 3,829	* 49,309
ITALY [2]					
All industries	5,877,222	1,871,272	1,632,413	412,393	612,490
Raw materials and energy production	36,469	13,956	* 19,780	* 17,210	* 2,846
Goods production	3,265,399	998,085	974,399	169,896	435,645
Distribution and transportation of goods	1,096,106	395,887	406,141	148,690	55,901
Information	134,398	27,172	* 20,912	* 16,929	* 626
Finance, insurance, real estate, and rental and leasing	589,444	214,911	66,055	* 22,962	66,958
Services	753,920	220,722	145,125	36,706	49,330
JAPAN (including Okinawa and Ryukyu Islands) [2]					
All industries	17,628,786	4,877,307	5,034,687	1,288,008	2,186,605
Raw materials and energy production	* 18,080	* 7,412	* 8,362	* 83	0
Goods production	6,014,856	1,947,929	1,322,096	338,920	1,057,638
Distribution and transportation of goods	2,434,568	1,022,673	904,306	435,382	329,064
Information	613,238	217,413	231,267	* 150,574	* 11,176
Finance, insurance, real estate, and rental and leasing	5,747,009	847,428	1,775,539	138,801	376,423
Services	2,800,524	834,451	792,445	223,905	412,304
LUXEMBOURG [2]					
All industries	11,302,154	979,228	3,516,688	791,018	3,138,324
Raw materials and energy production	d	d	d	d	d
Goods production	1,719,693	386,916	498,297	* 58,469	415,893
Distribution and transportation of goods	4,741,633	44,044	* 1,775,830	* 140,609	* 2,056,829
Information	* 2,840	* 157	0	0	* 204
Finance, insurance, real estate, and rental and leasing	622,219	90,584	69,503	* 28,967	100,240
Services	4,139,014	430,775	1,157,058	546,972	565,158
MALAYSIA [2]					
All industries	1,843,494	250,101	539,639	299,381	120,450
Raw materials and energy production	17,679	* 1,405	* 6,973	* 1,248	* 2,514
Goods production	1,127,269	115,909	265,189	142,335	66,974
Distribution and transportation of goods	235,750	57,385	105,708	* 13,055	1,965
Information	8,878	* 1,809	* 6,512	* 6,017	* 260
Finance, insurance, real estate, and rental and leasing	195,360	51,471	* 24,486	* 20,012	* 7,550
Services	257,065	21,805	130,770	116,714	41,187
MEXICO [2]					
All industries	14,381,348	3,209,063	2,781,934	755,905	375,839
Raw materials and energy production	860,293	61,888	* 35,517	* 9,853	* 10,245
Goods production	5,239,858	1,463,298	1,002,121	424,189	151,355
Distribution and transportation of goods	2,257,139	564,199	636,011	71,832	53,980
Information	159,508	37,315	* 11,103	* 3,464	* 5,126
Finance, insurance, real estate, and rental and leasing	3,727,313	781,023	198,080	* 21,273	52,674
Services	2,134,347	299,999	899,101	225,295	102,458
NETHERLANDS [2]					
All industries	46,513,837	4,614,303	10,958,126	2,525,737	5,924,095
Raw materials and energy production	896,031	198,978	* 50,116	0	17,628
Goods production	24,685,386	2,313,987	4,156,138	858,852	1,240,013
Distribution and transportation of goods	4,202,470	544,360	334,733	67,254	300,023
Information	1,155,582	186,494	* 1,518,814	* 102,302	81,872
Finance, insurance, real estate, and rental and leasing	3,866,142	313,579	885,190	* 62,123	2,446,275
Services	11,707,642	1,056,728	4,013,134	1,435,206	1,838,284

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	Current earnings and profits before income taxes	Income taxes			
	(9)	(10)	(11)	(12)	(13)
NEW ZEALAND [2]					
All industries	1,761,544	297,127	731,353	151,278	181,471
Raw materials and energy production	446,090	* 49,055	* 156,032	0	* 75,253
Goods production	507,793	72,782	255,965	* 30,948	* 4,051
Distribution and transportation of goods	237,815	85,057	109,035	86,565	5,751
Information	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	376,337	54,430	176,253	* 19,134	72,707
Services	158,244	25,157	30,094	* 11,216	19,530
NORWAY [2]					
All industries	3,339,339	2,090,470	681,304	546,936	32,603
Raw materials and energy production	2,787,379	* 1,964,548	* 583,155	* 502,612	* 15,107
Goods production	246,610	35,834	* 6,295	* 1,926	* 4,533
Distribution and transportation of goods	173,172	40,035	68,791	34,787	2,382
Information	* 2,305	* 176	* 3,866	* 3,866	* 154
Finance, insurance, real estate, and rental and leasing	11,820	* 1,481	* 260	0	* 5,845
Services	117,748	48,364	18,937	* 3,745	4,478
PHILIPPINES [2]					
All industries	1,582,462	205,872	811,651	203,068	60,788
Raw materials and energy production	411,117	59,699	453,365	* 361	* 2,175
Goods production	425,317	79,511	83,263	76,810	18,509
Distribution and transportation of goods	94,563	26,276	72,048	* 12,720	* 32
Information	* 26,745	* 533	* 452	* 450	* 6,380
Finance, insurance, real estate, and rental and leasing	416,530	26,966	111,511	* 62,059	* 27,668
Services	207,951	12,887	91,011	* 50,668	* 6,022
POLAND					
All industries	1,843,817	302,263	795,802	394,049	88,418
Raw materials and energy production	13,472	* 475	* 29	0	* 102
Goods production	1,066,060	167,258	437,379	99,605	44,775
Distribution and transportation of goods	195,656	40,022	21,419	* 2,079	2,897
Information	52,720	6,767	* 60,460	* 27,547	* 26,195
Finance, insurance, real estate, and rental and leasing	401,089	60,221	* 250,903	* 243,606	* 12,246
Services	114,821	27,520	25,612	* 21,212	* 2,204
PORTUGAL (including Azores) [2]					
All industries	1,896,057	338,251	439,115	45,350	683,216
Raw materials and energy production	d	d	d	d	d
Goods production	429,894	96,006	214,302	* 5,192	51,985
Distribution and transportation of goods	281,297	42,563	65,686	* 2,559	* 125,930
Information	50,534	10,327	* 17,137	* 9,014	* 647
Finance, insurance, real estate, and rental and leasing	65,913	14,679	* 2,358	0	* 2,710
Services	1,067,555	174,413	126,846	* 28,584	501,944
PUERTO RICO [2]					
All industries	2,996,452	264,567	592,756	266,746	159,212
Raw materials and energy production	d	d	d	d	d
Goods production	1,713,343	60,017	* 49,301	* 28,330	* 30,589
Distribution and transportation of goods	665,486	92,964	* 145,197	* 118,972	* 10,543
Information	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	317,123	63,184	192,357	* 68,580	10,727
Services	203,676	21,395	192,132	* 41,397	* 106,700
RUSSIA [2]					
All industries	1,139,674	235,689	284,510	52,223	* 10,554
Raw materials and energy production	d	d	d	d	d
Goods production	249,960	56,445	* 10,073	* 4,845	* 736
Distribution and transportation of goods	414,065	79,359	* 208,732	* 19,440	* 9,811
Information	273,577	61,512	17,375	* 10,417	0
Finance, insurance, real estate, and rental and leasing	23,502	2,157	0	0	* 7
Services	147,861	36,244	* 24,837	* 3,350	0

Footnotes at end of table.

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	Current earnings and profits before income taxes	Income taxes			
	(9)	(10)	(11)	(12)	(13)
SINGAPORE [2]					
All industries	5,698,601	560,961	1,579,545	649,335	659,632
Raw materials and energy production	15,061	7,036	* 6,958	* 6,958	* 3,149
Goods production	2,038,159	175,973	893,128	486,513	244,562
Distribution and transportation of goods	1,165,392	148,177	131,076	28,816	288,834
Information	112,824	11,463	* 39,067	* 38,427	* 6,908
Finance, insurance, real estate, and rental and leasing	833,025	114,834	19,641	* 3,192	42,479
Services	1,533,293	103,360	489,674	85,428	72,970
SOUTH AFRICA [2]					
All industries	2,021,424	524,721	481,803	173,203	53,877
Raw materials and energy production	* 57,570	* 294	0	0	0
Goods production	1,123,299	333,443	194,260	121,627	21,695
Distribution and transportation of goods	316,154	78,908	78,376	* 36,035	11,826
Information	62,719	17,582	* 24,214	* 243	* 3,606
Finance, insurance, real estate, and rental and leasing	182,850	41,624	76,962	* 2,559	* 2,241
Services	278,344	52,870	107,991	12,739	14,509
SOUTH KOREA [2]					
All industries	4,945,594	1,077,170	1,123,974	529,885	271,969
Raw materials and energy production	* 84,558	* 13,044	* 46,765	0	* 184
Goods production	2,907,405	640,782	734,954	277,113	117,722
Distribution and transportation of goods	721,961	198,508	205,722	176,560	35,596
Information	172,770	88,507	* 49,370	* 49,140	* 3,983
Finance, insurance, real estate, and rental and leasing	744,531	73,596	* 6,845	* 6,631	98,128
Services	310,455	62,301	80,319	20,441	16,355
SPAIN (including Canary Islands) [2]					
All industries	9,548,466	3,303,285	2,857,068	1,026,537	790,161
Raw materials and energy production	65,680	11,083	* 88,550	* 6,802	* 115
Goods production	3,285,510	673,404	828,255	172,967	169,120
Distribution and transportation of goods	3,103,738	1,651,435	901,373	214,404	538,407
Information	196,367	54,395	113,690	* 95,638	* 2,080
Finance, insurance, real estate, and rental and leasing	506,182	99,308	106,549	* 13,774	12,663
Services	2,390,110	813,476	818,650	522,951	67,777
SWEDEN [2]					
All industries	3,191,588	254,249	451,665	133,088	190,846
Raw materials and energy production	* 683	* 249	0	0	* 95
Goods production	1,416,856	80,594	109,952	* 21,281	42,231
Distribution and transportation of goods	213,472	49,909	76,188	38,888	34,833
Information	59,574	4,659	* 17,421	* 16,101	* 11,359
Finance, insurance, real estate, and rental and leasing	744,400	56,300	107,630	* 26,498	35,109
Services	753,625	62,264	140,465	30,319	67,209
SWITZERLAND [2]					
All industries	18,342,079	1,407,976	6,558,563	384,310	3,187,457
Raw materials and energy production	* 131,606	* 6,173	* 100,701	0	* 85,768
Goods production	5,337,094	563,552	1,866,310	124,509	1,070,656
Distribution and transportation of goods	5,182,672	394,068	1,512,039	64,532	1,091,301
Information	542,566	25,566	51,011	* 32,443	* 8,906
Finance, insurance, real estate, and rental and leasing	615,015	90,060	248,246	* 135,073	127,927
Services	6,532,808	328,504	2,780,257	27,753	802,899
TAIWAN [2]					
All industries	2,955,503	458,330	733,081	309,421	48,151
Raw materials and energy production	d	d	d	d	d
Goods production	1,427,934	231,866	322,869	230,782	35,677
Distribution and transportation of goods	354,817	95,071	108,991	* 62,866	* 3,179
Information	* 9,827	* 2,596	* 3,739	* 3,715	0
Finance, insurance, real estate, and rental and leasing	949,066	74,766	* 210,456	* 674	* 6,355
Services	213,703	54,030	87,026	11,384	* 2,939

Footnotes at end of table.

Controlled Foreign Corporations, 2004

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Table 3. U.S. Corporations and Their Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Sector of Controlled Foreign Corporation, Tax Year 2004—Continued

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

Selected country of incorporation and industrial sector of Controlled Foreign Corporation	Controlled Foreign Corporations—continued				
	Foreign corporations with (+) current earnings and profits before income taxes		Distributions out of earnings and profits	Dividends paid to controlling U.S. corporation	Total Subpart F income
	Current earnings and profits before income taxes	Income taxes			
	(9)	(10)	(11)	(12)	(13)
THAILAND [2]					
All industries	1,947,203	281,104	441,712	163,300	102,703
Raw materials and energy production	* 143,831	* 57,225	* 30,055	* 13,955	* 162
Goods production	1,154,679	74,038	276,943	57,125	* 97,149
Distribution and transportation of goods	321,445	67,530	78,646	50,857	3,766
Information	* 4,641	* 901	* 555	* 565	* 168
Finance, insurance, real estate, and rental and leasing	167,621	51,321	17,205	* 12,843	* 1,223
Services	153,126	29,893	38,308	27,956	* 235
UNITED KINGDOM AND NORTHERN IRELAND (including Gibraltar) [2]					
All industries	50,517,786	7,031,050	17,845,878	4,409,066	4,520,656
Raw materials and energy production	2,904,037	604,674	1,988,335	* 1,433,655	93,925
Goods production	7,277,964	1,217,781	2,832,461	815,106	783,144
Distribution and transportation of goods	5,474,769	912,964	1,621,836	449,371	465,876
Information	1,918,656	325,723	426,685	76,574	149,869
Finance, insurance, real estate, and rental and leasing	18,175,107	2,232,485	5,486,115	721,233	1,385,424
Services	14,751,338	1,734,910	5,472,791	913,126	1,641,273
VENEZUELA [2]					
All industries	2,825,365	444,830	1,467,625	532,856	59,790
Raw materials and energy production	376,205	52,958	* 169,954	0	* 25,216
Goods production	1,338,808	221,681	711,573	148,673	7,734
Distribution and transportation of goods	275,610	50,214	21,066	* 14,162	7,730
Information	d	d	d	d	d
Finance, insurance, real estate, and rental and leasing	88,265	14,305	* 28,447	* 26,498	* 377
Services	537,730	25,484	415,698	* 342,945	9,658
EUROPEAN UNION, TOTAL [2]					
All industries	194,478,228	27,613,398	58,594,038	17,795,692	22,789,759
Raw materials and energy production	4,175,545	889,170	2,278,115	1,497,786	167,865
Goods production	65,323,901	9,157,011	19,030,499	5,010,025	4,924,203
Distribution and transportation of goods	28,407,380	5,460,880	7,096,482	1,655,388	4,140,863
Information	8,118,165	930,387	5,979,778	3,725,136	544,852
Finance, insurance, real estate, and rental and leasing	33,975,854	4,278,236	8,773,986	1,572,072	6,359,074
Services	54,410,639	6,883,899	15,417,331	4,335,284	6,650,333
OPEC COUNTRIES, TOTAL [2]					
All industries	5,246,705	999,286	2,296,100	751,248	103,284
Raw materials and energy production	1,932,938	421,790	736,083	* 73,085	* 26,723
Goods production	1,604,129	288,142	842,137	230,886	15,061
Distribution and transportation of goods	508,974	75,020	52,122	27,704	29,602
Information	210,975	81,103	* 120,886	* 578	* 9,922
Finance, insurance, real estate, and rental and leasing	324,587	77,523	90,202	* 50,362	* 4,408
Services	663,739	55,517	454,670	368,633	16,706

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

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

[1] Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one industrial sector. The industrial activity of the parent corporation filing the return often differs from that of the Controlled Foreign Corporations.

[2] Includes "Nature of business not allocable," not shown separately.

NOTE: Detail may not add to totals because of rounding and because data are shown for selected countries only.

Corporate Foreign Tax Credit, 2004

by Scott Luttrell

For 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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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)
All industries	0.03
Agriculture, forestry, fishing, and hunting	2.70
Mining	0.51
Utilities	0.25
Construction	1.65
Manufacturing	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
Wholesale and retail trade	0.07
Transportation and warehousing	0.08
Information	0.29
Publishing (except Internet), motion picture and sound recording	0.24
Finance, insurance, real estate, rental and leasing	0.08
Finance and Insurance	0.08
Securities, commodity contracts, etc.	0.27
Insurance and related activities	[1]
Services	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

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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-

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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

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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)
All industries	5,502	25,290,504,785	6,917,754,854	37,358,533	8,162	41,559,877	33,112,410
Agriculture, forestry, fishing, and hunting	210	6,517,157	2,732,554	* 29,198	0	* 14	* 6,573
Mining	112	110,207,132	47,148,873	466,457	0	264,731	151,399
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
Utilities	7	* 33,884,369	* 23,271,942	* 128,792	0	* 9,324	* 23,904
Construction	235	16,558,584	29,663,763	15,338	0	* 7,854	8,788
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
Manufacturing	1,039	5,506,544,210	3,032,693,340	25,459,266	7,426	27,549,087	24,910,024
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
Wholesale and retail trade	658	1,006,536,246	1,218,304,368	3,005,584	* 12	2,634,926	2,432,170
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

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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
Transportation and warehousing	68	167,899,586	139,786,280	124,361	0	609,212	103,691
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
Information	607	579,780,011	276,313,995	2,723,574	0	2,100,540	1,345,019
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
Finance, insurance, real estate, and rental and leasing	965	9,011,349,757	1,455,904,414	2,735,131	* 724	4,942,919	1,497,862
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
Services	1,603	8,851,227,733	691,935,324	2,670,831	0	3,441,268	2,632,978
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

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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)
All industries	558,505,871	533,194,188	187,480,142	187,679,640	56,593,276	271,709
Agriculture, forestry, fishing, and hunting	442,721	298,828	103,425	103,425	11,559	* 19
Mining	6,690,737	6,562,286	2,337,064	2,337,038	1,434,081	0
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
Utilities	* 767,632	* 756,881	* 264,891	* 264,891	* 29,961	0
Construction	1,332,583	1,303,359	455,431	453,504	21,821	0
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
Manufacturing	243,418,308	237,880,892	83,484,837	83,466,195	37,151,333	270,913
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
Wholesale and retail trade	65,121,081	63,131,970	22,111,524	22,343,433	2,985,951	0
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.

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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)
Retail trade	36,058,477	35,445,129	12,408,531	12,640,551	749,209	0
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
Transportation and warehousing	8,909,927	8,659,025	3,032,180	3,032,140	197,508	0
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
Information	40,646,179	35,937,456	12,601,181	12,600,545	2,764,509	0
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
Finance, insurance, real estate, and rental and leasing	104,263,876	93,746,105	33,356,183	33,348,281	5,745,227	* 4
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
Services	86,912,827	84,917,385	29,733,427	29,730,188	6,251,328	* 773
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

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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)
All industries	7,166,067	118,907,935	485,354,155	86,339,067	33,129,305	57,724,090
Agriculture, forestry, fishing, and hunting	* 1,928	89,765	176,994	29,340	* 6,573	* 2,556
Mining	10,407	866,460	8,507,542	731,192	151,399	439,454
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
Utilities	* 245	* 196,055	* 170,777	* 138,116	* 23,904	* 8,181
Construction	5,760	338,984	270,747	32,902	8,788	* 1,755
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
Manufacturing	3,753,251	40,656,848	251,450,340	55,924,861	24,912,421	8,515,131
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
Wholesale and retail trade	308,983	18,614,177	21,889,530	6,371,758	2,437,526	550,021
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

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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)
Retail trade	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
Transportation and warehousing	31,222	2,780,737	13,611,474	727,022	103,691	105,312
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
Information	271,414	9,543,782	36,404,233	8,462,463	1,344,901	283,657
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
Finance, insurance, real estate, and rental and leasing	910,386	24,602,780	77,132,720	7,956,569	1,497,838	25,242,705
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
Services	1,872,471	21,218,347	75,739,797	5,964,842	2,642,262	22,575,318
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

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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)
All industries	79,964,798	26,382,011	201,814,884	49,446,665	97,936,689	243,861,018	133,043,631
Agriculture, forestry, fishing, and hunting	* 13,425	0	125,100	0	* 13,640	69,258	* 47,287
Mining	169,573	353,116	6,662,808	2,633,006	2,804,878	4,088,567	3,066,442
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
Utilities	* 7,217	* 20,360	* -27,002	0	* 17,627	* 80,889	* 26,240
Construction	* 49,246	95,355	82,702	0	* 33,325	162,578	140,768
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
Manufacturing	49,310,395	5,817,481	106,970,051	* 44,744,997	21,703,179	96,857,064	50,761,023
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
Wholesale and retail trade	4,460,939	740,485	7,328,800	* 2,000,154	4,991,158	10,219,946	7,533,917
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

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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)
Retail trade	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
Transportation and warehousing	180,074	6,843,294	5,652,080	* 3,023	4,839,547	11,167,148	9,831,704
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
Information	17,706,348	1,748,029	6,858,835	0	5,606,565	21,823,468	15,163,309
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
Finance, insurance, real estate, and rental and leasing	2,254,302	4,409,215	35,772,090	0	19,629,429	47,548,294	24,434,181
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
Services	5,813,279	6,354,676	32,389,420	* 65,485	38,297,342	51,843,806	22,038,761
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

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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)
All industries	1,860,464	4,571,450	15,009,924	111,601,793	110,817,387	13,485,504
Agriculture, forestry, fishing, and hunting	* 150	0	0	* 47,137	* 21,971	* 673
Mining	* 40,937	* 68,438	* 116,081	2,840,986	1,022,125	* 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
Utilities	0	0	* 1,598	* 24,641	* 54,649	0
Construction	* 109	* 7,446	61,737	71,476	21,810	* 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
Manufacturing	383,599	143,870	700,015	49,533,540	46,096,041	10,906,052
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
Wholesale and retail trade	33,672	443,182	169,727	6,887,336	2,686,030	70,576
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

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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
Transportation and warehousing	* 1,719	* 9,004	5,857,822	3,963,160	1,335,443	* 25,432
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
Information	* 225,340	3,140,831	1,378,101	10,419,036	6,660,160	2,145,207
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
Finance, insurance, real estate, and rental and leasing	642,443	374,261	3,426,984	19,990,492	23,114,114	* 15,804
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
Services	532,495	384,418	3,297,859	17,823,989	29,805,044	298,157
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

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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)
All industries	42,001,568	54,391,211	10,984,748	241,493,136	27,827,198	213,665,938
Agriculture, forestry, fishing, and hunting	* 10,534	* 10,633	0	107,736	* 14,447	93,290
Mining	482,400	482,337	1,132,503	4,418,975	166,142	4,252,833
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
Utilities	* 29,501	* 25,026	0	* 89,888	0	* 89,888
Construction	* 890	* 20,493	0	108,170	* 2,041	106,129
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
Manufacturing	15,239,527	19,617,336	* 9,612,746	154,593,276	22,769,849	131,823,426
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
Wholesale and retail trade	1,019,125	1,445,641	* 216,401	11,669,584	1,006,550	10,663,033
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

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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
Transportation and warehousing	8,600	1,295,194	* 221	2,444,326	* 151,153	2,293,173
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
Information	704,809	3,753,108	0	14,580,764	369,440	14,211,324
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
Finance, insurance, real estate, and rental and leasing	11,017,958	11,823,907	0	29,584,426	1,922,966	27,661,459
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
Services	13,488,225	15,917,537	* 22,877	23,895,992	1,424,609	22,471,383
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

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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:
	(39)	(40)	(41)	(42)	(43)	(44)
All industries	73,561,030	4,449,968	16,854,198	61,156,800	28,000,049	1,493,093
Agriculture, forestry, fishing, and hunting	25,069	* 2	* 13,529	11,542	4,969	82
Mining	2,226,848	157,893	745,536	1,639,204	1,487,805	160,666
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
Utilities	* 32,684	0	* 698	* 31,986	* 8,082	* 2,448
Construction	26,540	0	4,704	21,836	12,974	2,188
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
Manufacturing	50,847,662	3,991,148	12,420,594	42,418,216	17,538,828	734,004
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
Wholesale and retail trade	3,442,478	* 219,016	588,378	3,073,115	635,513	73,312
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

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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
Transportation and warehousing	251,844	* 270	45,472	206,642	103,155	6,556
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
Information	3,272,288	* 60,408	663,405	2,669,290	1,263,860	68,081
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
Finance, insurance, real estate, and rental and leasing	6,260,565	* 3,254	1,390,595	4,873,224	3,375,386	195,757
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
Services	7,175,052	* 17,977	981,286	6,211,742	3,569,477	250,000
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

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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—continued						
	Foreign taxes paid or accrued—continued						Taxes deemed paid
	Taxes withheld at source on—continued		Other taxes paid or accrued on:				
			Branch income	Specifically allocable income (section 863(b))	Service income	Other income	
Interest	Rents, royalties, and license fees						
	(45)	(46)	(47)	(48)	(49)	(50)	(51)
All industries	1,017,826	2,678,122	5,734,096	63,225	298,690	16,714,997	33,156,751
Agriculture, forestry, fishing, and hunting	* 147	* 214	* 2,211	0	0	* 2,316	* 6,573
Mining	18,547	9,262	337,998	0	* 11,968	949,363	151,399
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
Utilities	* 588	* 722	* 4,324	0	0	* [2]	* 23,904
Construction	* 153	* 1,077	* 3,563	0	5,164	830	8,862
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
Manufacturing	177,638	1,678,418	1,402,748	54,240	64,185	13,427,595	24,879,389
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	* 503	* 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
Wholesale and retail trade	29,679	153,804	245,149	* 2,430	14,504	116,635	2,437,602
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

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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—continued						
	Foreign taxes paid or accrued—continued						Taxes deemed paid
	Taxes withheld at source on—continued		Other taxes paid or accrued on:				
			Branch income	Specifically allocable income (section 863(b))	Service income	Other income	
Interest	Rents, royalties, and license fees						
	(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
Transportation and warehousing	2,809	9,492	* 61,865	* 2	15,410	7,020	103,488
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
Information	4,612	527,601	483,479	* 749	17,830	161,508	1,405,431
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
Finance, insurance, real estate, and rental and leasing	511,445	44,012	1,381,779	* 4,671	70,965	1,166,758	1,497,838
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
Services	272,208	253,521	1,810,980	* 1,132	98,663	882,972	2,642,265
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

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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)
ALL INDUSTRIES						
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
AGRICULTURE, FORESTRY, FISHING, AND HUNTING						
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
MINING						
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
UTILITIES						
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

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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)
CONSTRUCTION						
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
MANUFACTURING						
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
WHOLESALE AND RETAIL TRADE						
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
TRANSPORTATION AND WAREHOUSING						
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.

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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
INFORMATION	(1)	(2)	(3)	(4)	(5)	(6)
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
FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING						
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
SERVICES						
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.

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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)
ALL INDUSTRIES					
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
AGRICULTURE, FORESTRY, FISHING, AND HUNTING					
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
MINING					
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
UTILITIES					
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.

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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)
CONSTRUCTION					
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
MANUFACTURING					
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
WHOLESALE AND RETAIL TRADE					
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
TRANSPORTATION AND WAREHOUSING					
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.

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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)
INFORMATION					
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
FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING					
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
SERVICES					
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

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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 not allocable to specific types of income
	Deductions 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)
ALL INDUSTRIES						
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
AGRICULTURE, FORESTRY, FISHING, AND HUNTING						
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
MINING						
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
UTILITIES						
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

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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 not allocable to specific types of income
	Deductions 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)
CONSTRUCTION						
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
MANUFACTURING						
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
WHOLESALE AND RETAIL TRADE						
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
TRANSPORTATION AND WAREHOUSING						
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.

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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 not allocable to specific types of income
	Deductions 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)
INFORMATION						
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
FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING						
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
SERVICES						
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

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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				Taxable income (less loss) before adjustments	Adjustments to taxable income
	Deductions not allocable to specific types of income—continued			Deductions from oil and gas extraction income [6]		
	Research and development	Interest	Other			
	(18)	(19)	(20)	(21)	(22)	(23)
ALL INDUSTRIES						
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
AGRICULTURE, FORESTRY, FISHING, AND HUNTING						
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
MINING						
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	0	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
UTILITIES						
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.

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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				Taxable income (less loss) before adjustments	Adjustments to taxable income
	Deductions not allocable to specific types of income—continued			Deductions from oil and gas extraction income [6]		
	Research and development	Interest	Other			
	(18)	(19)	(20)	(21)	(22)	(23)
CONSTRUCTION						
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
MANUFACTURING						
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
WHOLESALE AND RETAIL TRADE						
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
TRANSPORTATION AND WAREHOUSING						
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.

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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				Taxable income (less loss) before adjustments	Adjustments to taxable income
	Deductions not allocable to specific types of income—continued			Deductions from oil and gas extraction income [6]		
	Research and development	Interest	Other			
	(18)	(19)	(20)	(21)	(22)	(23)
INFORMATION						
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
FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING						
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
SERVICES						
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

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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					
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Foreign taxes paid or accrued	
						Total	Dividends
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
ALL INDUSTRIES							
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
AGRICULTURE, FORESTRY, FISHING, AND HUNTING							
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
MINING							
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
UTILITIES							
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

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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					
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Foreign taxes paid or accrued	
						Total	Dividends
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
CONSTRUCTION							
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
MANUFACTURING							
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
WHOLESALE AND RETAIL TRADE							
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
TRANSPORTATION AND WAREHOUSING							
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

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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					
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Foreign taxes paid or accrued	
						Total	Dividends
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
INFORMATION							
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
FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING							
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
SERVICES							
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.

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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)
ALL INDUSTRIES							
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
AGRICULTURE, FORESTRY, FISHING, AND HUNTING							
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
MINING							
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
UTILITIES							
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

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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)
CONSTRUCTION							
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
MANUFACTURING							
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
WHOLESALE AND RETAIL TRADE							
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
TRANSPORTATION AND WAREHOUSING							
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

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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)
INFORMATION							
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
FINANCE, INSURANCE, REAL ESTATE, AND RENTAL AND LEASING							
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
SERVICES							
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.

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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)
All geographic areas	5,502	485,354,155	86,339,067	33,129,305	57,724,090	79,964,798
Canada	2,046	42,232,089	15,245,435	6,379,958	4,856,144	5,165,583
Latin America, total	1,001	36,598,523	7,263,509	2,429,032	6,584,244	5,824,507
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
Other Western Hemisphere, total	276	13,357,496	6,988,146	444,386	943,346	2,501,589
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
Europe, total	2,141	194,470,817	40,458,448	17,240,767	23,535,763	32,616,144
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.

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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)
Europe, total—continued						
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
Africa, total	407	12,015,047	1,467,980	764,983	551,633	482,087
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.

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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)
Asia, total	1,319	96,725,155	10,885,940	4,758,454	6,218,821	21,467,661
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
Oceania, total	633	15,801,575	2,198,783	822,016	2,977,792	1,611,537
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
Puerto Rico and U.S. Possessions, total	2,197	37,535,019	1,201,725	118,635	11,089,584	4,536,108
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
Country not stated	22	76,691	* 741	* 65	* 16,150	* 845
Section 863(b) income	262	25,654,294	0	0	* 31,045	* 37,038
Foreign Sales Corporation dividends [1]	7	* 151,679	* 151,162	* 517	0	0
Interest-Charge Domestic International Sales Corporation dividends [1]	45	* 928	* 928	0	0	0

Footnotes at end of table.

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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)
All geographic areas	26,382,011	201,814,884	49,446,665	97,936,689	243,861,018	10,984,748
Canada	2,672,920	7,912,050	9,189,560	5,896,449	13,913,939	715,722
Latin America, total	1,403,457	13,093,774	3,996,559	5,919,075	16,639,247	* 1,291,995
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
Other Western Hemisphere, total	109,583	2,370,445	* 150,496	85,508	2,157,046	* 10,236
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
Europe, total	10,751,837	69,867,858	* 19,414,427	44,687,861	95,509,981	* 5,016,087
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.

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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)
Europe, total—continued						
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
Africa, total	837,008	7,911,355	* 6,697,005	2,199,166	4,564,552	* 1,674,619
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.

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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)
Asia, total	4,312,124	49,082,154	7,749,103	31,597,770	50,856,146	* 1,713,531
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
Oceania, total	1,554,168	6,637,279	* 1,599,133	3,778,425	9,021,586	* 258,815
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
Puerto Rico and U.S. Possessions, total	3,584,494	17,004,472	* 650,382	1,555,786	29,677,084	* 302,894
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
Country not stated	* 48,686	* 10,203	0	* 25,478	61,375	0
Section 863(b) income	590,386	24,995,825	0	* 2,885	15,863,760	0
Foreign Sales Corporation dividends [1]	0	0	0	0	* 131,025	0
Interest-Charge Domestic International Sales Corporation dividends [1]	0	0	0	0	* 46	0

Footnotes at end of table.

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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	Taxes withheld at source on:		
				Dividends	Interest	Rents, royalties, and license fees
	(13)	(14)	(15)	(16)	(17)	(18)
All geographic areas	241,493,136	61,198,066	28,000,049	1,493,093	1,017,826	2,678,122
Canada	28,318,150	8,262,038	1,820,958	237,808	104,430	173,704
Latin America, total	19,959,275	5,338,955	2,909,920	266,073	118,968	724,697
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
Other Western Hemisphere, total	11,200,450	464,327	19,932	* 688	* 4,159	* 1,318
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
Europe, total	98,960,836	27,877,895	10,633,215	594,621	547,844	313,338
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.

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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	Taxes withheld at source on:		
				Dividends	Interest	Rents, royalties, and license fees
	(13)	(14)	(15)	(16)	(17)	(18)
Europe, total—continued						
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
Africa, total	7,450,494	3,313,491	2,548,508	9,135	661	11,103
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

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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	Taxes withheld at source on:		
				Dividends	Interest	Rents, royalties, and license fees
	(13)	(14)	(15)	(16)	(17)	(18)
Asia, total	45,869,009	11,999,230	7,237,126	250,436	55,273	874,204
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
Oceania, total	6,779,989	1,795,608	973,592	27,943	64,973	53,578
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
Puerto Rico and U.S. Possessions, total	7,857,935	1,261,708	1,143,059	83,186	119,886	97,775
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
Country not stated	15,316	* 4,218	* 4,153	0	0	* 53
Section 863(b) income	9,790,534	62,486	62,486	0	0	0
Foreign Sales Corporation dividends [1]	* 20,654	* 517	0	0	0	0
Interest-Charge Domestic International Sales Corporation dividends [1]	* 883	* 6	* 6	* 6	0	0

Footnotes at end of table.

Corporate Foreign Tax Credit, 2004

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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)
All geographic areas	5,734,096	63,225	298,690	16,714,997	33,198,017
Canada	547,654	0	37,217	720,144	6,441,080
Latin America, total	504,417	0	51,679	1,244,087	2,429,035
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
Other Western Hemisphere, total	* 11,910	0	* 100	* 1,757	444,395
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
Europe, total	1,549,007	0	85,091	7,543,313	17,244,680
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

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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)
Europe, total—continued					
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
Africa, total	189,398	0	2,783	2,335,429	764,983
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

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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)
Asia, total	2,315,854	* 134	67,306	3,673,918	4,762,105
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 Penninsula	* 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
Oceania, total	331,073	0	8,243	487,782	822,016
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
Puerto Rico and U.S. Possessions, total	149,225	* 605	29,004	663,377	118,649
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
Country not stated	* 3,983	0	0	* 117	* 65
Section 863(b) income	0	62,486	0	0	0
Foreign Sales Corporation dividends [1]	0	0	0	0	* 517
Interest-Charge Domestic International Sales Corporation dividends [1]	0	0	0	0	0

* 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.

Partnership and Sole Proprietorship Data, by Region and State, for Tax Years 2002-2005

by Brian J. Maisano

This article highlights partnership and sole proprietorship data by region and State tabulated by the Bureau of Economic Analysis (BEA) for the Statistics of Income Division (SOI). SOI uses these tabulations in its capacity as an IRS office which prepares and publishes statistics on the operations associated with the execution and application of the internal revenue laws. BEA uses geographic coding data obtained from the Nonemployer Statistics program at the Census Bureau to assign tax records to the proper States based on the Zip Codes contained in the IRS record extracts.¹ This process also identifies and suppresses any data associated with frequencies of less than three at the State level to ensure that they are disclosure-free. BEA then tabulates the number of returns and the unincorporated business income for SOI by State for partnerships and sole proprietorships. No statistical tabulations or research results are released which would potentially reveal identifiable information about individuals, employers, or establishments.²

Partnership Returns, 2002-2005

BEA tabulates the total number of partnership returns and three variables—gross receipts (less returns and allowances), ordinary income (or loss), and the number of partners.³ Gross receipts are tabulated from data reported on line 1c of Form 1065. This includes gross receipts from line 1a minus returns and allowances reported on line 1b. Ordinary income (loss) is tabulated from data reported on line 22 of Form 1065. It includes total income or loss (line 8) minus total deductions (line 21).

From 2002-2005, the total tabulated number of partnership returns for the United States increased 23 percent, from 2,336,313 to 2,873,194 (Table 1). Over this period, the Southeast region experienced the fastest growth of 36.1 percent. Florida was the

fastest growing State in this region, with an increase of 34,623 in the number of partnership returns, or 79.2 percent over the period. Georgia, North Carolina, and Virginia also contributed significantly to the growth of the region. In 2005, the Southeast also held the greatest share of the total number of partnership returns in the nation, with 12.1 percent.

The States in the Southwest region also experienced relatively rapid growth in the number of partnership returns for the 2002-2005 period, with the largest increases occurring in Arizona and Texas. The Great Lakes region experienced the slowest growth from 2002-2005, with a 21.9-percent increase over the period.

The Southeast and Southwest regions were also the fastest growing regions in terms of gross receipts (less returns and allowances) from 2002-2005 (Table 2). Florida showed the fastest growth among the States with a 113.2-percent increase, while Texas showed the largest increase in dollar amounts with a \$69.7-billion increase over the period for a 40.1-percent growth rate. The Southeast also accounted for the greatest share of U.S. gross receipts (less returns and allowances) in 2005 with 21.4 percent. Figure A shows the States ranked in quintiles by growth rates in partnership gross receipts from 2002-2005.

Tabulated ordinary income for the United States rose by \$131.6 billion from 2002-2005, an increase of 103.7 percent (Table 3). The Southeast region had the largest growth in dollar terms among the regions, with an increase of \$29.7 billion in ordinary income. Florida, North Carolina, and Georgia made up the bulk of this growth with increases of \$9.7 billion, \$4.9 billion, and \$3.8 billion, respectively. California and Texas showed the largest growth in dollar amounts with increases of \$19.1 billion and \$15.4 billion. Connecticut experienced a substantial increase in partnership ordinary income over the period. Most of the increase occurred between 2004 and 2005, when ordinary income increased from \$3.3 billion to \$14.6 billion.

Brian J. Maisano is an economist in the Regional Income Division of the Bureau of Economic Analysis.

¹ BEA assigns tax records to States based on the Zip Code given on the first page of Form 1065 for partnerships and Form 1040 for sole proprietorships. These Zip Codes reflect only the filing address and therefore do not necessarily reflect the exact location of the business activity.

² For a more detailed statement of the sources and methods used to produce BEA State and local area estimates of Personal Income, see the BEA Web site at <http://www.bea.gov/regional/methods.cfm>.

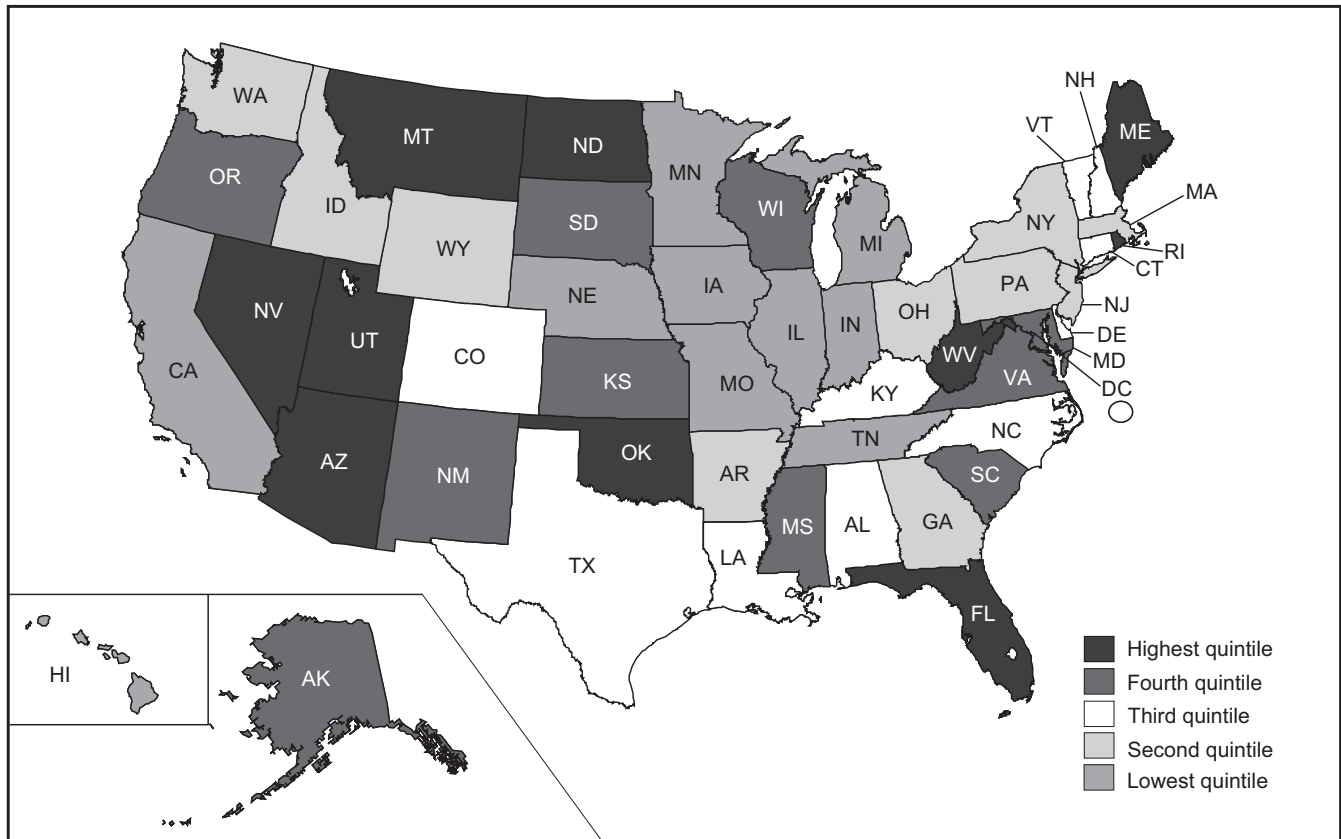
³ BEA tabulated figures are based on unedited population extracts. U.S. totals for the variables included do not match published SOI totals, which are estimates based on edited samples.

Partnership and Sole Proprietorship Data

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Figure A

Partnerships: Gross Receipts Growth Rates, 2002-2005



Sole Proprietorship Returns, 2002-2005

BEA tabulates the total number of sole proprietorship returns and two variables from sole proprietorship returns to the State level—gross receipts (less returns and allowances) and net profit or loss.^{4,5} Gross receipts from sole proprietorships are tabulated from line 3 of Form 1040 Schedule C. This is calculated as gross receipts or sales (line 1) minus returns and allowances (line 2). Net profit or loss is tabulated from line 31 of Form 1040 Schedule C. Net profit or loss equals gross income (line 7) minus total expenses (line 28) and expenses for business use of a home (line 30).

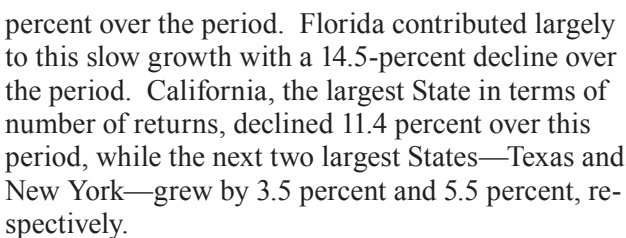
The total number of sole proprietorship returns for the United States, as tabulated by BEA, grew by 392,396 from 2002-2005, a 1.9-percent increase over the period (Table 4). The Great Lakes were the fastest growing region over the period, increasing by 9.0 percent to 3,135,856 returns in 2005, due to strong growth in Michigan, Wisconsin, and Illinois. Among all States, Georgia had both the largest percentage increase and the largest increase in the number of returns over the period, from 583,810 returns in 2002 to 678,878 returns in 2005, for a 16.3-percent increase. This growth, however, was not reflected in the rest of the Southeast, which only grew at 1.0

⁴ Sole proprietors report business income or loss on Form 1040, Schedule C. BEA tabulates the number of sole proprietorship returns as the number of Schedule C forms filed for a given tax year.

⁵ BEA tabulated figures are based on unedited population extracts. U.S. totals for the variables included do not match published SOI totals, which are estimates based on edited samples.

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Sole Proprietorships: Gross Receipts Growth Rates, 2002-2005



over the period. Iowa, New Mexico, and California saw significant decreases in gross receipts from 2002-2005, bringing down the growth rates in their respective regions. Figure B shows the States ranked in quintiles by growth rates in sole proprietorship gross receipts from 2002-2005.

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growing States, while Iowa, Mississippi, and New Mexico experienced the largest percentage decreases over the period.

Future Research

This article presents the first of what is to be an ongoing series of articles examining geographic data for partnerships and sole proprietorships. In constructing a time series of data for these tabulations, a number

of possibilities for future investigation have been suggested. Further refinement in the processing of the unedited population extracts should lead to a reduction in the number of unidentifiable records. This will allow presentation of the data by major industrial sector and with expanded geographic detail. Analysis and interpretation of year-to-year variations in the data will benefit from increased understanding of tax law changes, as well as expanded processing capabilities.

Partnership and Sole Proprietorship Data

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Table 1. Partnerships: Number of Returns, by Region and State, Tax Years 2002-2005

[All figures are based on tabulated population extracts]

Region and State	Number of returns				Percentage cumulative change, 2002-2005
	2002	2003	2004	2005	
	(1)	(2)	(3)	(4)	(5)
United States, total	2,336,313	2,481,381	2,669,959	2,873,194	23.0
New England, total	64,573	69,568	74,433	78,938	22.2
Connecticut	27,641	29,242	30,595	31,785	15.0
Maine	3,837	4,218	4,613	5,023	30.9
Massachusetts	21,301	23,039	24,805	26,634	25.0
New Hampshire	6,067	6,817	7,707	8,355	37.7
Rhode Island	3,324	3,688	3,936	4,167	25.4
Vermont	2,403	2,564	2,777	2,974	23.8
Mideast, total	187,809	201,724	219,521	239,249	27.4
Delaware	3,922	4,410	4,956	5,517	40.7
District of Columbia	3,119	3,290	3,565	3,920	25.7
Maryland	21,485	23,311	25,639	28,146	31.0
New Jersey	44,535	49,808	55,544	61,562	38.2
New York	73,397	77,414	83,015	89,671	22.2
Pennsylvania	41,351	43,491	46,802	50,433	22.0
Great Lakes, total	159,806	170,218	182,857	194,834	21.9
Illinois	38,517	40,851	44,100	47,432	23.1
Indiana	19,411	20,683	22,095	23,516	21.1
Michigan	37,451	39,930	42,928	45,310	21.0
Ohio	40,471	43,267	46,401	49,590	22.5
Wisconsin	23,956	25,487	27,333	28,986	21.0
Plains, total	88,112	94,028	101,665	108,558	23.2
Iowa	12,365	13,071	14,004	15,054	21.7
Kansas	14,650	15,427	16,342	17,319	18.2
Minnesota	20,559	22,210	24,467	26,321	28.0
Missouri	23,830	25,710	28,066	30,160	26.6
Nebraska	8,182	8,594	9,206	9,689	18.4
North Dakota	4,123	4,387	4,559	4,709	14.2
South Dakota	4,403	4,629	5,021	5,306	20.5
Southeast, total	256,053	280,247	311,028	348,467	36.1
Alabama	16,554	17,712	19,184	21,007	26.9
Arkansas	10,814	11,500	12,517	13,708	26.8
Florida	43,690	51,912	63,156	78,313	79.2
Georgia	29,524	32,569	36,630	41,168	39.4
Kentucky	16,517	17,742	19,123	20,418	23.6
Louisiana	20,427	22,443	23,571	25,316	23.9
Mississippi	10,345	10,978	11,652	12,378	19.7
North Carolina	29,608	31,956	34,835	38,455	29.9
South Carolina	14,488	15,809	17,480	19,179	32.4
Tennessee	31,372	32,435	34,226	36,171	15.3
Virginia	26,031	28,242	31,250	34,584	32.9
West Virginia	6,683	6,949	7,404	7,770	16.3
Southwest, total	163,640	179,791	199,234	221,324	35.3
Arizona	28,392	31,215	34,804	39,095	37.7
New Mexico	7,530	8,084	8,789	9,439	25.4
Oklahoma	18,108	19,297	20,899	22,694	25.3
Texas	109,610	121,195	134,742	150,096	36.9
Rocky Mountain, total	76,465	81,654	89,214	96,784	26.6
Colorado	34,981	37,320	40,237	43,022	23.0
Idaho	8,872	9,511	10,466	11,716	32.1
Montana	6,605	7,029	7,643	8,145	23.3
Utah	21,386	22,969	25,658	28,306	32.4
Wyoming	4,621	4,825	5,210	5,595	21.1
Far West, total	226,213	238,747	257,098	277,500	22.7
Alaska	2,983	3,106	3,343	3,543	18.8
California	159,763	167,495	178,693	191,589	19.9
Hawaii	4,213	4,519	5,056	5,492	30.4
Nevada	15,087	16,865	19,364	22,068	46.3
Oregon	17,359	18,693	20,303	22,137	27.5
Washington	26,808	28,069	30,339	32,671	21.9
State not allocable [1]	1,113,642	1,165,404	1,234,909	1,307,540	17.4

[1] Data not allocated to State due to unidentifiable records in the unedited population extracts.

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Table 2. Partnerships: Gross Receipts (Less Returns and Allowances), by Region and State, Tax Years 2002-2005

[All figures are based on tabulated population extracts—money amounts are in thousands of dollars]

Region and State	Gross receipts (less returns and allowances)				Percentage cumulative change, 2002-2005
	2002	2003	2004	2005	
	(1)	(2)	(3)	(4)	(5)
United States, total	1,463,277,909	1,590,575,764	1,801,212,095	2,019,174,623	38.0
New England, total	65,392,231	70,208,235	81,941,303	90,779,881	38.8
Connecticut	23,742,277	26,127,727	30,072,612	33,237,934	40.0
Maine	2,239,265	2,577,866	3,317,114	3,670,286	63.9
Massachusetts	29,410,983	30,039,395	35,122,510	38,545,858	31.1
New Hampshire	5,620,816	6,245,510	7,387,819	8,114,377	44.4
Rhode Island	3,331,596	4,083,648	4,703,775	5,734,106	72.1
Vermont	1,047,294	1,134,089	1,337,473	1,477,320	41.1
Mideast, total	272,801,837	289,445,934	324,162,970	365,045,428	33.8
Delaware	4,722,799	5,241,977	6,229,482	6,861,744	45.3
District of Columbia	8,016,677	9,064,808	9,568,109	10,980,244	37.0
Maryland	25,257,352	28,954,800	32,518,265	37,082,514	46.8
New Jersey	57,753,223	57,463,130	65,292,148	75,359,882	30.5
New York	120,883,603	130,947,081	145,521,217	161,447,340	33.6
Pennsylvania	56,168,183	57,774,138	65,033,749	73,313,704	30.5
Great Lakes, total	200,152,351	213,803,278	237,640,261	256,173,541	28.0
Illinois	67,750,538	73,658,519	81,136,575	87,874,957	29.7
Indiana	28,873,267	30,363,121	33,546,828	34,667,834	20.1
Michigan	42,268,102	46,209,191	48,073,385	50,077,455	18.5
Ohio	42,431,609	43,660,562	50,067,929	55,708,689	31.3
Wisconsin	18,828,835	19,911,885	24,815,544	27,844,606	47.9
Plains, total	86,758,202	91,037,364	105,063,266	113,581,602	30.9
Iowa	10,757,392	11,784,591	14,042,692	13,799,473	28.3
Kansas	10,373,748	11,650,031	13,819,772	16,563,933	59.7
Minnesota	22,277,985	23,593,549	25,895,107	28,005,208	25.7
Missouri	28,510,019	27,826,566	33,349,173	36,405,220	27.7
Nebraska	10,172,431	10,346,447	11,059,873	11,208,663	10.2
North Dakota	1,866,635	2,186,439	2,803,623	3,290,646	76.3
South Dakota	2,799,992	3,649,741	4,093,026	4,308,459	53.9
Southeast, total	283,189,514	319,631,655	373,560,389	432,938,814	52.9
Alabama	16,511,890	17,208,727	21,358,340	23,460,180	42.1
Arkansas	9,716,452	11,241,467	11,213,375	13,062,686	34.4
Florida	55,073,856	71,329,337	91,551,811	117,443,553	113.2
Georgia	45,077,883	47,028,284	54,929,105	59,033,240	31.0
Kentucky	17,661,145	21,123,704	24,325,832	25,102,096	42.1
Louisiana	18,602,678	20,700,300	21,299,355	25,512,132	37.1
Mississippi	7,386,356	7,797,036	9,043,647	10,874,523	47.2
North Carolina	31,519,873	33,947,174	37,530,165	44,472,126	41.1
South Carolina	10,214,280	11,570,138	13,648,709	16,425,834	60.8
Tennessee	42,360,142	45,604,837	50,980,780	53,251,581	25.7
Virginia	25,934,691	28,546,325	33,391,199	39,141,226	50.9
West Virginia	3,130,268	3,534,326	4,288,071	5,159,637	64.8
Southwest, total	219,994,035	244,643,635	276,632,983	323,941,702	47.3
Arizona	24,416,223	27,946,890	35,584,644	43,532,827	78.3
New Mexico	3,832,817	4,148,254	5,022,195	6,015,518	56.9
Oklahoma	18,200,070	22,091,225	23,635,998	31,181,353	71.3
Texas	173,544,925	190,457,266	212,390,146	243,212,004	40.1
Rocky Mountain, total	56,440,013	61,056,612	70,480,892	82,314,728	45.8
Colorado	31,946,848	35,226,648	38,402,203	44,480,334	39.2
Idaho	7,611,313	7,568,564	9,659,342	10,269,332	34.9
Montana	2,435,868	2,832,836	3,857,962	4,510,303	85.2
Utah	12,179,271	12,656,025	15,277,720	19,975,825	64.0
Wyoming	2,266,713	2,772,539	3,283,665	3,078,934	35.8
Far West, total	233,654,912	256,539,997	285,722,981	310,621,563	32.9
Alaska	2,264,356	2,511,308	2,863,433	3,527,755	55.8
California	171,946,740	188,702,099	205,194,475	221,059,151	28.6
Hawaii	4,278,166	4,155,862	5,254,195	5,426,983	26.9
Nevada	13,749,900	16,414,665	20,049,685	23,429,660	70.4
Oregon	14,459,568	15,661,678	19,468,040	21,169,555	46.4
Washington	26,956,182	29,094,385	32,893,153	36,008,459	33.6
State not allocable [1]	44,894,814	44,209,054	46,007,050	43,777,364	-2.5

[1] Data not allocated to State due to unidentifiable records in the unedited population extracts.

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Table 3. Partnerships: Ordinary Income, by Region and State, Tax Years 2002-2005

[All figures are based on tabulated population extracts—money amounts are in thousands of dollars]

Region and State	Ordinary income				
	2002	2003	2004	2005	Percentage cumulative change, 2002-2005
	(1)	(2)	(3)	(4)	(5)
United States, total	126,836,609	146,732,668	187,656,385	258,423,055	103.7
New England, total	6,012,143	5,987,529	9,048,652	21,365,477	255.4
Connecticut	2,061,420	1,877,039	3,340,887	14,625,259	609.5
Maine	115,733	95,599	170,898	250,439	116.4
Massachusetts	3,186,458	3,342,463	4,593,226	5,287,962	66.0
New Hampshire	249,747	137,734	343,891	389,741	56.1
Rhode Island	316,964	459,388	477,581	692,040	118.3
Vermont	81,821	75,306	122,169	120,036	46.7
Mideast, total	19,027,754	26,960,003	38,362,898	46,292,888	143.3
Delaware	-603,591	488,899	327,676	1,811,644	[1]
District of Columbia	2,197,464	2,634,702	2,860,220	3,315,861	50.9
Maryland	1,202,631	231,194	1,816,445	3,941,739	227.8
New Jersey	1,321,707	3,151,411	4,434,643	6,924,572	423.9
New York	12,801,694	16,070,244	23,777,525	22,894,314	78.8
Pennsylvania	2,107,849	4,383,553	5,146,389	7,404,758	251.3
Great Lakes, total	15,760,899	16,150,214	22,213,364	23,831,049	51.2
Illinois	8,111,124	9,063,189	10,590,021	10,946,246	35.0
Indiana	1,348,924	720,592	2,115,175	2,536,862	88.1
Michigan	2,792,170	2,923,445	4,353,127	3,855,257	38.1
Ohio	2,666,193	2,524,248	3,017,937	4,595,841	72.4
Wisconsin	842,488	918,740	2,137,104	1,896,843	125.1
Plains, total	1,762,910	3,981,634	5,071,266	8,424,834	377.9
Iowa	618,360	901,526	837,738	955,374	54.5
Kansas	-8,654	-480,363	-108,059	331,468	[1]
Minnesota	497,334	1,833,968	1,913,786	2,090,446	320.3
Missouri	-187,024	916,018	1,551,994	3,211,291	[1]
Nebraska	545,822	392,064	268,832	1,108,872	103.2
North Dakota	118,298	153,129	202,186	228,718	93.3
South Dakota	178,774	265,292	404,789	498,665	178.9
Southeast, total	12,674,517	17,354,379	25,147,032	42,357,478	234.2
Alabama	706,076	1,028,499	1,164,681	2,085,608	195.4
Arkansas	636,019	661,118	813,088	1,178,910	85.4
Florida	1,927,995	3,041,745	5,775,239	11,577,540	500.5
Georgia	2,688,332	2,378,417	3,915,241	6,522,807	142.6
Kentucky	775,100	757,280	1,231,638	1,357,915	75.2
Louisiana	825,841	1,595,704	2,170,323	3,011,209	264.6
Mississippi	53,476	440,507	516,536	231,254	332.4
North Carolina	692,863	1,720,894	1,523,184	5,601,790	708.5
South Carolina	157,228	433,022	534,173	1,110,513	606.3
Tennessee	2,854,146	2,863,303	3,922,426	4,457,735	56.2
Virginia	1,078,356	2,163,942	3,266,180	4,494,370	316.8
West Virginia	279,085	269,948	314,323	727,827	160.8
Southwest, total	14,558,386	22,150,812	25,989,178	38,227,502	162.6
Arizona	386,825	1,055,978	2,270,290	4,005,992	935.6
New Mexico	359,491	386,972	490,938	746,287	107.6
Oklahoma	1,354,033	3,555,244	3,369,748	5,642,188	316.7
Texas	12,458,037	17,152,618	19,858,202	27,833,035	123.4
Rocky Mountain, total	1,342,860	1,842,859	4,335,711	7,642,863	469.1
Colorado	824,006	1,024,527	2,798,555	4,777,479	479.8
Idaho	75,442	272,137	387,449	492,553	552.9
Montana	160,362	132,996	262,640	538,309	235.7
Utah	143,536	281,395	655,325	1,550,213	980.0
Wyoming	139,514	131,804	231,742	284,309	103.8
Far West, total	16,821,268	19,764,267	30,248,239	42,596,444	153.2
Alaska	-1,726,283	-1,464,872	-882,698	-1,307,663	[1]
California	13,016,640	16,993,518	24,591,991	32,096,390	146.6
Hawaii	236,307	212,890	538,441	578,419	144.8
Nevada	3,206,397	1,443,092	2,178,646	4,304,483	34.2
Oregon	215,263	215,698	857,424	1,422,724	560.9
Washington	1,872,944	2,363,941	2,964,435	5,502,091	193.8
State not allocable [2]	38,875,872	32,540,971	27,240,045	27,684,520	-28.8

[1] Percentage changes cannot be calculated.

[2] Data not allocated to State due to unidentifiable records in the unedited population extracts.

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Table 4. Sole Proprietorships: Number of Returns, by Region and State, Tax Years 2002-2005

[All figures are based on tabulated population extracts]

Region and State	Number of returns				Percentage cumulative change, 2002-2005
	2002	2003	2004	2005	
	(1)	(2)	(3)	(4)	(5)
United States, total	20,255,392	21,186,271	20,814,210	20,647,788	1.9
New England, total	1,073,047	1,116,184	1,134,502	1,154,713	7.6
Connecticut	248,218	259,318	263,006	267,847	7.9
Maine	120,211	123,990	126,778	128,742	7.1
Massachusetts	469,378	488,539	495,263	503,450	7.3
New Hampshire	106,528	111,639	114,659	117,819	10.6
Rhode Island	65,760	67,961	68,554	69,829	6.2
Vermont	62,952	64,737	66,242	67,026	6.5
Mideast, total	3,105,148	3,254,624	3,283,536	3,336,704	7.5
Delaware	44,838	47,320	49,008	50,891	13.5
District of Columbia	38,464	39,704	40,999	41,811	8.7
Maryland	388,198	410,291	420,604	431,620	11.2
New Jersey	530,870	560,676	564,142	575,942	8.5
New York	1,347,676	1,416,485	1,411,271	1,422,354	5.5
Pennsylvania	755,102	780,148	797,512	814,086	7.8
Great Lakes, total	2,877,417	2,987,712	3,059,136	3,135,856	9.0
Illinois	805,418	846,716	864,450	884,120	9.8
Indiana	385,455	393,461	399,674	408,741	6.0
Michigan	621,419	647,582	668,428	693,153	11.5
Ohio	724,737	746,613	762,233	778,642	7.4
Wisconsin	340,388	353,340	364,351	371,200	9.1
Plains, total	1,477,779	1,520,060	1,543,262	1,436,684	-2.8
Iowa	223,863	228,800	231,627	118,830	-46.9
Kansas	206,014	210,755	212,186	212,825	3.3
Minnesota	396,408	409,678	415,347	417,327	5.3
Missouri	401,522	416,556	426,658	432,879	7.8
Nebraska	134,890	136,972	138,011	135,324	0.3
North Dakota	50,682	51,648	52,259	53,038	4.6
South Dakota	64,400	65,651	67,174	66,461	3.2
Southeast, total	4,818,627	5,066,181	5,149,321	4,867,332	1.0
Alabama	285,326	297,925	309,685	323,019	13.2
Arkansas	190,091	195,637	199,949	205,935	8.3
Florida	1,209,435	1,273,930	1,266,641	1,034,339	-14.5
Georgia	583,810	631,695	646,790	678,878	16.3
Kentucky	270,143	278,755	285,232	289,113	7.0
Louisiana	283,056	296,101	297,464	288,372	1.9
Mississippi	172,418	179,384	180,918	148,885	-13.6
North Carolina	574,316	602,006	618,439	634,829	10.5
South Carolina	253,375	265,399	273,443	282,548	11.5
Tennessee	434,617	454,834	468,368	477,628	9.9
Virginia	460,522	487,070	498,205	399,549	-13.2
West Virginia	101,518	103,445	104,187	104,237	2.7
Southwest, total	2,372,121	2,511,229	2,378,103	2,406,937	1.5
Arizona	333,925	354,849	321,922	327,197	-2.0
New Mexico	125,417	129,269	129,681	91,684	-26.9
Oklahoma	271,160	279,881	284,109	288,995	6.6
Texas	1,641,619	1,747,230	1,642,391	1,699,061	3.5
Rocky Mountain, total	796,938	828,649	829,361	844,323	5.9
Colorado	391,426	406,390	405,147	406,893	4.0
Idaho	111,260	116,229	118,739	123,602	11.1
Montana	88,187	90,566	91,390	92,133	4.5
Utah	161,448	169,955	168,451	175,169	8.5
Wyoming	44,617	45,509	45,634	46,526	4.3
Far West, total	3,609,806	3,766,813	3,349,207	3,379,636	-6.4
Alaska	59,728	61,197	60,643	60,638	1.5
California	2,660,363	2,780,245	2,350,483	2,357,754	-11.4
Hawaii	91,055	94,656	96,763	98,285	7.9
Nevada	131,482	142,522	140,795	145,673	10.8
Oregon	262,662	268,404	273,237	278,869	6.2
Washington	404,516	419,789	427,286	438,417	8.4
State not allocable [1]	124,509	134,819	87,782	85,603	-31.2

[1] Data not allocated to State due to unidentifiable records in the unedited population extracts.

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Table 5. Sole Proprietorships: Gross Receipts (Less Returns and Allowances), by Region and State, Tax Years 2002-2005

[All figures are based on tabulated population extracts—money amounts are in thousands of dollars]

Region and State	Gross receipts (less returns and allowances)				Percentage cumulative change, 2002-2005
	2002	2003	2004	2005	
	(1)	(2)	(3)	(4)	(5)
United States, total	904,755,983	934,181,335	955,786,516	974,777,191	7.7
New England, total	55,838,504	58,103,580	62,524,727	65,366,894	17.1
Connecticut	15,031,223	15,731,252	17,295,856	18,610,363	23.8
Maine	5,532,165	5,804,209	6,181,542	6,339,230	14.6
Massachusetts	23,338,245	24,012,400	25,406,912	26,303,407	12.7
New Hampshire	6,417,042	6,807,596	7,479,654	7,757,287	20.9
Rhode Island	2,783,268	2,912,747	3,089,648	3,182,992	14.4
Vermont	2,736,561	2,835,376	3,071,115	3,173,615	16.0
Mideast, total	133,249,198	138,860,647	147,441,949	152,838,300	14.7
Delaware	1,780,879	1,853,209	2,031,453	2,153,467	20.9
District of Columbia	1,263,260	1,347,885	1,477,612	1,498,202	18.6
Maryland	14,115,996	15,023,703	16,419,941	17,267,724	22.3
New Jersey	25,793,444	27,414,481	29,790,651	31,779,238	23.2
New York	50,836,084	52,743,803	55,195,031	56,741,266	11.6
Pennsylvania	39,459,535	40,477,566	42,527,261	43,398,403	10.0
Great Lakes, total	110,261,461	113,807,170	119,451,994	122,677,299	11.3
Illinois	29,214,342	30,137,194	31,408,297	32,007,263	9.6
Indiana	13,874,951	14,112,770	14,649,735	15,000,069	8.1
Michigan	22,820,933	23,600,745	24,582,315	25,487,420	11.7
Ohio	28,839,035	29,794,867	31,598,127	32,216,978	11.7
Wisconsin	15,512,200	16,161,594	17,213,520	17,965,569	15.8
Plains, total	57,680,317	59,653,960	62,636,139	59,122,891	2.5
Iowa	8,548,326	8,796,199	9,270,021	4,712,618	-44.9
Kansas	8,411,382	8,642,897	9,043,738	9,393,399	11.7
Minnesota	14,716,606	15,278,145	15,950,165	15,982,649	8.6
Missouri	16,193,113	16,979,048	17,978,687	18,609,951	14.9
Nebraska	4,931,422	4,975,115	5,124,494	5,041,057	2.2
North Dakota	1,973,013	2,010,625	2,154,125	2,228,943	13.0
South Dakota	2,906,455	2,971,931	3,114,909	3,154,274	8.5
Southeast, total	189,510,032	197,086,655	208,105,489	208,474,645	10.0
Alabama	12,553,259	12,941,664	13,834,273	14,899,125	18.7
Arkansas	7,792,100	8,049,973	8,487,309	8,896,615	14.2
Florida	37,996,430	38,134,798	40,351,415	38,124,494	0.3
Georgia	22,223,008	23,365,923	24,388,046	25,658,743	15.5
Kentucky	10,516,194	11,029,579	11,656,105	12,101,262	15.1
Louisiana	11,196,329	11,808,556	11,347,680	11,755,908	5.0
Mississippi	8,357,806	8,689,357	8,347,424	7,082,527	-15.3
North Carolina	23,121,292	24,005,535	25,588,284	26,823,405	16.0
South Carolina	11,030,586	11,620,758	12,546,846	13,453,742	22.0
Tennessee	22,451,033	23,851,220	25,826,991	27,471,083	22.4
Virginia	17,588,034	18,784,430	20,608,766	16,922,059	-3.8
West Virginia	4,683,961	4,804,862	5,122,350	5,285,682	12.8
Southwest, total	105,823,968	110,364,381	108,657,216	114,270,006	8.0
Arizona	13,269,758	14,053,406	14,289,746	15,516,461	16.9
New Mexico	4,836,716	5,034,113	5,234,867	3,644,112	-24.7
Oklahoma	11,024,642	11,488,326	12,200,303	13,032,202	18.2
Texas	76,692,852	79,788,536	76,932,300	82,077,231	7.0
Rocky Mountain, total	30,250,540	31,188,285	32,428,508	34,004,364	12.4
Colorado	14,877,641	15,168,510	15,563,364	15,919,658	7.0
Idaho	4,674,563	4,877,932	5,342,725	5,885,385	25.9
Montana	3,723,507	3,880,666	4,031,815	4,170,000	12.0
Utah	5,077,284	5,297,940	5,394,693	5,822,173	14.7
Wyoming	1,897,545	1,963,237	2,095,911	2,207,148	16.3
Far West, total	213,637,593	220,386,490	209,718,247	213,337,077	-0.1
Alaska	3,012,205	3,137,927	3,254,951	3,374,847	12.0
California	169,187,964	173,705,467	160,234,080	161,010,951	-4.8
Hawaii	3,727,499	4,066,569	4,424,545	4,803,436	28.9
Nevada	6,508,620	7,101,364	7,716,091	8,218,540	26.3
Oregon	11,840,126	12,146,093	12,858,743	13,646,574	15.3
Washington	19,361,179	20,229,070	21,229,837	22,282,729	15.1
State not allocable [1]	8,504,370	4,730,167	4,822,247	4,685,715	-44.9

[1] Data not allocated to State due to unidentifiable records in the unedited population extracts.

Partnership and Sole Proprietorship Data

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Table 6. Sole Proprietorships: Net Profit or Loss, by Region and State, Tax Years 2002-2005

[All figures are based on tabulated population extracts—money amounts are in thousands of dollar]

Region and State	Net profit or loss				Percentage cumulative change, 2002-2005
	2002	2003	2004	2005	
	(1)	(2)	(3)	(4)	(5)
United States, total	210,132,477	216,435,630	227,668,931	234,425,658	11.6
New England, total	15,336,990	15,691,281	17,112,626	17,758,675	15.8
Connecticut	4,256,497	4,357,319	4,801,148	5,110,539	20.1
Maine	1,031,863	1,156,225	1,212,353	1,240,851	20.3
Massachusetts	7,056,541	7,169,654	7,797,902	7,977,019	13.0
New Hampshire	1,506,471	1,523,677	1,690,264	1,765,602	17.2
Rhode Island	866,882	895,310	949,343	966,214	11.5
Vermont	618,736	589,096	661,616	698,450	12.9
Mideast, total	38,164,909	38,760,436	42,124,180	43,545,562	14.1
Delaware	460,411	485,882	530,590	526,447	14.3
District of Columbia	573,967	542,839	676,195	684,107	19.2
Maryland	3,977,163	4,012,693	4,504,317	4,632,995	16.5
New Jersey	7,963,541	8,192,935	8,957,638	9,466,656	18.9
New York	15,958,002	16,086,487	17,562,905	17,696,693	10.9
Pennsylvania	9,231,825	9,439,600	9,892,535	10,538,664	14.2
Great Lakes, total	26,291,649	27,064,576	28,571,804	28,874,897	9.8
Illinois	7,974,810	8,446,321	8,923,148	8,976,446	12.6
Indiana	3,230,327	3,319,964	3,540,675	3,597,267	11.4
Michigan	5,322,483	5,410,603	5,636,809	5,752,345	8.1
Ohio	6,693,124	6,754,667	7,122,909	7,099,522	6.1
Wisconsin	3,070,905	3,133,021	3,348,263	3,449,317	12.3
Plains, total	11,812,641	12,126,475	12,850,013	12,319,788	4.3
Iowa	1,649,741	1,703,569	1,737,582	951,306	-42.3
Kansas	1,603,950	1,657,884	1,767,680	1,884,994	17.5
Minnesota	3,456,530	3,602,966	3,814,575	3,824,763	10.7
Missouri	3,345,433	3,393,442	3,610,711	3,735,226	11.7
Nebraska	934,139	890,011	967,232	946,473	1.3
North Dakota	383,251	388,806	419,740	448,746	17.1
South Dakota	439,597	489,797	532,493	528,280	20.2
Southeast, total	41,548,034	42,707,862	46,224,988	46,113,214	11.0
Alabama	2,133,207	2,195,906	2,312,735	2,471,187	15.8
Arkansas	1,181,789	1,335,313	1,399,518	1,497,515	26.7
Florida	10,788,856	10,839,526	12,011,729	11,622,927	7.7
Georgia	4,497,440	4,476,251	4,706,168	4,873,112	8.4
Kentucky	2,168,316	2,242,066	2,390,593	2,463,365	13.6
Louisiana	2,337,742	2,423,568	2,387,588	2,453,273	4.9
Mississippi	1,467,313	1,491,884	1,443,892	1,182,300	-19.4
North Carolina	4,586,429	4,764,781	5,223,964	5,556,460	21.2
South Carolina	1,940,171	2,026,447	2,153,115	2,038,085	5.0
Tennessee	4,454,815	4,576,414	5,225,197	5,738,360	28.8
Virginia	5,009,590	5,350,924	5,922,788	5,126,326	2.3
West Virginia	982,366	984,782	1,047,701	1,090,304	11.0
Southwest, total	21,297,066	22,043,814	22,302,798	24,439,295	14.8
Arizona	2,770,516	2,932,491	3,138,690	3,722,035	34.3
New Mexico	902,273	960,514	998,059	785,314	-13.0
Oklahoma	1,878,828	1,885,671	1,979,854	2,335,654	24.3
Texas	15,745,449	16,265,138	16,186,195	17,596,292	11.8
Rocky Mountain, total	6,351,770	6,397,703	6,900,537	7,389,912	16.3
Colorado	3,674,477	3,693,518	3,878,098	3,960,051	7.8
Idaho	760,083	782,343	889,965	1,005,601	32.3
Montana	645,920	670,548	708,583	769,773	19.2
Utah	908,060	886,310	997,809	1,189,117	31.0
Wyoming	363,230	364,984	426,082	465,370	28.1
Far West, total	46,887,468	49,007,874	48,793,558	51,546,233	9.9
Alaska	582,646	623,703	649,134	710,418	21.9
California	37,223,425	38,691,879	37,412,084	38,981,767	4.7
Hawaii	944,205	1,043,609	1,137,956	1,321,872	40.0
Nevada	1,247,493	1,394,867	1,683,893	1,816,170	45.6
Oregon	2,316,125	2,413,800	2,703,874	2,988,613	29.0
Washington	4,573,574	4,840,016	5,206,617	5,727,393	25.2
State not allocable [1]	2,441,950	2,635,609	2,788,427	2,438,082	25.2

[1] Data not allocated to State due to unidentifiable records in the unedited population extracts.

Wealth Transfers, 2005 Gifts

by Darien Jacobson and Melissa Laine

The Federal transfer tax system, a mechanism for taxing the transfer of assets from one person to another, includes three major components: the estate tax, the generation-skipping transfer tax, and the gift tax. The gift tax, reported on IRS Form 709, *United States Gift (and Generation-Skipping Transfer) Tax Return*, is incurred for property transfers during the donor's life, *inter vivos* transfers, whereas the estate tax is assessed or incurred on property transferred after death. The purpose of this article is to explore data derived from gift tax returns filed in 2006, demonstrative of gifts given in 2005.¹

Gift tax data provide valuable information on donors, who are primarily wealthy Americans. These data, the result of statistical studies completed by the Statistics of Income (SOI) Division of the Internal Revenue Service (IRS), are tabulated for each filing year and come directly from Form 709.²

The total population of 2005 donors was 261,104, who transferred \$38.5 billion in total gifts to selected donees, or gift recipients. Donors transferred a broad range of assets, including cash, publicly traded stock, real estate, and others. Of the gift tax returns filed, only 2.9 percent reported a tax liability.

Different types of gift-giving vehicles were used to transfer assets from donor to donee. Direct, or outright, transfers comprised 76.3 percent of total assets given. Simple trusts, defined by the Internal Revenue Code as a trust that must distribute all income annually, comprised 7.3 percent of total assets given. Female donors gave a total of \$21.7 billion in gifts, while males gave \$16.8 billion.³

Background

The Federal gift tax, part of the U.S. transfer tax system that also includes estate and generation-skipping transfer taxes, was enacted in the Revenue Act

of 1924.⁴ Federal transfer taxes are incurred or assessed when property is transferred during life or after death.

The Revenue Act of 1924 provided a foundation for the initial structure of gift taxation by establishing giving-ceilings for both annual and lifetime gifts. The annual exemption rule, or the amount a donor may transfer during a year without incurring tax liability, was set at \$500, while the lifetime exemption, the total amount that a donor may give away during his or her lifetime without tax liability, was set at \$50,000.

The gift tax was repealed in 1926, but this hiatus would prove to be short-lived. Wide-spread depression in the 1930s led the U.S. Government to find alternate sources of funding, and the gift tax was reinstated with the passage of the Revenue Act of 1932.⁵ The tax rates were set at three-fourths of the estate tax rates, which continued until 1976 when the transfer tax system underwent a broad revision.⁶

The Tax Reform Act of 1976 created a unified gift and estate tax framework "consisting of a single, graduated rate of tax imposed on both lifetime gifts and testamentary dispositions."⁷ Gift tax rates increased as donors made successive taxable gifts throughout their lives, ending with the highest rates imposed on transfers made at the time of death.⁸ The Tax Reform Act of 1976 also merged the estate and gift tax exclusions into a single gift and estate tax lifetime credit. While this credit may be used to reduce tax liability for *inter vivos* wealth transfers, any remaining credit may be used to offset estate taxes incurred at the time of death.⁹

A gift is taxed based on the year in which the gift is transferred or completed. While the Taxpayer Protection Act of 1997 indexed the annual exemption for gift taxes, initially set at \$10,000 in 1998, broader changes were made to the transfer tax system in the new millennium.¹⁰ The Economic Growth and Tax Relief Reconciliation Act (EGTRRA) of 2001 gradually increased the lifetime exemption amounts for

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¹ Approximately 95 percent of gifts reported on Filing Year 2006 returns were given in 2005.

² For more information, see the SOI Gift Tax page at <http://www.irs.gov/taxstats/indtaxstats/article/0,,id=96464,00.html>

³ The remainder of gifts were given by donors of undetermined sex.

⁴ Luckey, John R., "A History of Federal Estate, Gift, and Generation-Skipping Taxes," April 9, 2003, Congressional Research Service, Library of Congress, p. 8.

⁵ Ibid, p. 9.

⁶ Ibid, p. 11.

⁷ Ibid, p. 11-12.

⁸ Ibid, p. 12.

⁹ P.L. 94-455.

¹⁰ P.L. 105-34.

gift taxes to \$1,000,000, with a maximum tax rate of 35 percent.¹¹ While the other two components of the transfer tax system, the estate tax and generation-skipping transfer tax, will be repealed at the end of 2009 without further legislation, the gift tax will remain intact. The EGTRRA provisions will expire in 2011, and the gift tax exemption amounts and maximum tax rates will revert to 2001 tax law levels.

Throughout the era of gift taxation, many components have been introduced that altered the calculation of tax. In 1948, the marital deduction was enacted, allowing interspousal gifts without tax liability. Along with the marital deduction, the split-gift rule was established, allowing the nondonor spouse to elect to be treated as having made half of the total transfer.¹²

Three types of transfers are not defined as “gifts” and, therefore, are not subject to the gift tax under the Internal Revenue Code (IRC). First, gifts to political organizations are not taxed when they meet the criteria of IRC section 527(e) (1). Second, gifts of tuition made to a qualifying educational institution on behalf of an individual are not taxable, as long as the payment is made directly to the educational institution. Finally, the gift tax does not apply to the amount of medical expenses on behalf of an individual, paid directly to the individual or to the medical institution that provided care.

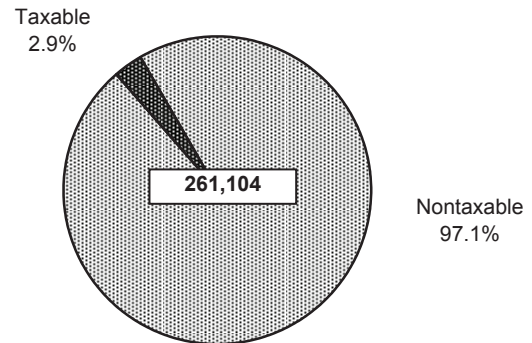
2005 Gifts

The Statistics of Income Division collects data directly from IRS Form 709, which requires a donor to specify all assets transferred during a given calendar year. These include a broad range of assets, such as cash, real estate, trusts, and artwork. Also collected are data on the specific gift-giving mechanism through which assets were given. These mechanisms could include (but are not limited to) direct, or outright, gifts and gifts through trust.

The population of 2005 donors filed 261,104 gift tax returns, which documented the transfer of more than \$38.5 billion in total gifts. Of these gift returns filed, 253,440, or 97.1 percent, were nontaxable (Figure A). A total of \$1.7 billion in gift tax liability was incurred on the other 7,664 returns filed for gifts given in 2005.

Figure A

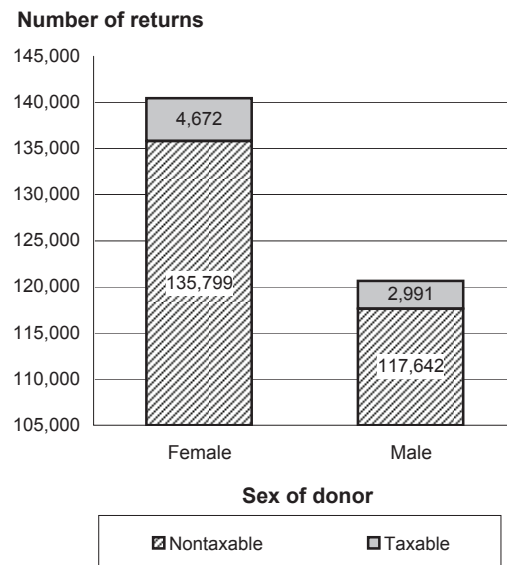
Percentage of Taxable and Nontaxable Gift Tax Returns, 2005 Gifts



When the donor population is examined by sex, females comprised the majority, filing 53.8 percent of gift tax returns, and males comprised the remainder, filing 46.2 percent in 2005. For the filing year, females and males filed nearly equal percentages of nontaxable returns; 96.7 percent of returns filed by females and 97.5 of returns filed by males incurred no tax liability (Figure B).

Figure B

Taxable and Nontaxable Gift Tax Returns, 2005 Donors



¹¹ P.L. 107-16.

¹² Luckey, John R., “A History of Federal Estate, Gift, and Generation-Skipping Taxes,” April 9, 2003, Congressional Research Service, Library of Congress, p. 11.

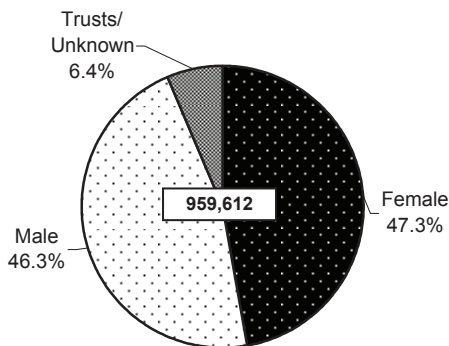
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The 2005 donee population included 959,612 individuals, organizations, and trusts that received gifts in 2005. Females received 47.3 percent of total gifts, while males received slightly fewer, 46.3 percent (Figure C). The remainder of gifts were given to trusts, organizations, or unknown donees.

Figure C

Composition of Donee Population, 2005



The gift tax return requires that donors specify the gift mechanism that they used to transfer assets to their selected recipients. While many of these 2005 gifts were given directly, donors also used simple trusts, insurance trusts, split-interest trusts, and 529-trusts. While direct gifts become the donee's property immediately, gifts through trust may be contingent on a specified future event.

Simple trusts comprise a majority of trusts used for gifted assets. Simple trusts are predominantly trusts, insurance trusts, split-interest trusts, and 529-trusts. While direct gifts become the donee's property immediately, gifts through trust may be contingent on a specified future event.

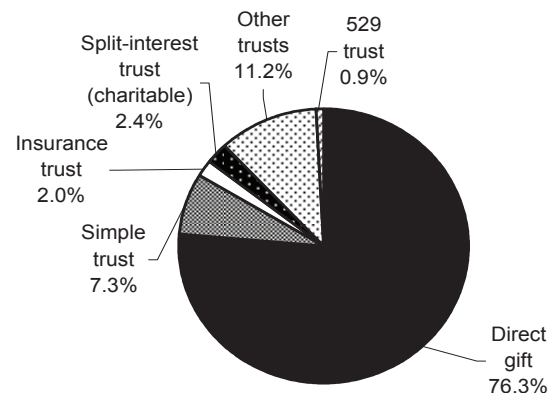
Simple trusts comprise a majority of trusts used for gifted assets. Simple trusts are predominantly established for the benefit of a single individual. Another widely used gift mechanism is an insurance trust. The purpose of a life insurance trust is for a policyholder to transfer ownership of the insurance policy to the trust in order to remove the policy from his or her estate, thereby avoiding possible estate taxation. A third type of gift mechanism is the split-in-

terest trust, which has dual recipients: a private beneficiary and a charity.¹³ Finally, a 529-trust allows a donor to save specifically for the educational costs of a named beneficiary. Along with direct gifts, these trust instruments make up the majority of vehicles by which gifted assets are transferred.

For gifts given in 2005, most assets were transferred by direct gift. Direct gifts comprised 76.3 percent of total gifts, for a total of \$29.4 billion in asset transfers. Second were simple trusts, which transferred \$2.8 billion in assets, or 7.3 percent of total assets (Figure D). Other trusts, which comprised 11.2 percent of asset transfers, included family, personal, marital, personal residence, generation-skipping, and other unspecified trusts.

Figure D

Transfer Method of Gifts, 2005



NOTE: Percentages may not add to total due to rounding.

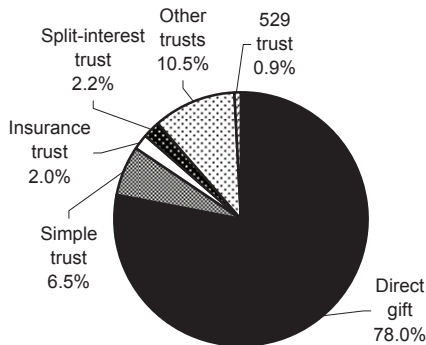
Although the gift method used by females and males were similar, females used direct gifts more than males, for 78.0 percent and 74.0 percent of asset transfers, respectively. Females and males used 529-trusts at the same rate, 0.9 percent of total asset transfers. More men than women used simple trusts, at 8.3 percent and 6.5 percent of total asset transfers, respectively (Figure E).

A broad range of assets were transferred from donor to donee, including (but not limited to) cash, publicly traded or closely held stock, real estate, part-

¹³ For more information on split-interest trust data, please see: <http://www.irs.gov/taxstats/charitablestats/article/0,,id=97066,00.html>

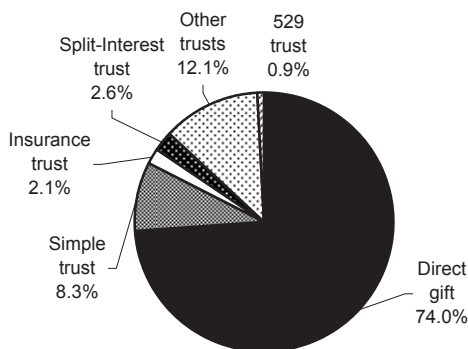
Figure E

Transfer Method of Gifts, Female Donors, 2005



NOTE: Percentages may not add to total due to rounding.

Transfer Method of Gifts, Male Donors, 2005



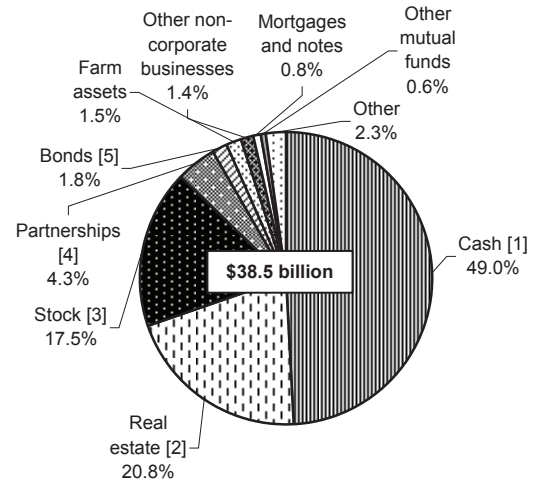
NOTE: Percentages may not add to total due to rounding.

nerships, bonds, mutual funds, art, and insurance. A total of \$38.5 billion in gifts was given in 2005. The most common gift was cash, which comprised \$18.9 billion, or 49.0 percent of total gifts given. Gifts of cash included both cash and cash management accounts. The second largest asset transferred was real estate, which includes personal residences, improved real estate, and vacant land; real estate partnerships; farmland; and real estate mutual funds. Gifts of real estate totaled \$8.0 billion, or 20.8 percent of total gifts reported for 2005. The third most gifted asset was stock, including both publicly traded and closely held stock, comprising 17.5 percent of assets, for a total gift amount of \$6.7 billion (Figure F).

Similar analysis may be completed by donor sex. Men and women show different preferences in gift giving. Figure G shows that cash was the largest

Figure F

Asset Composition of Gifts, 2005



[1] Cash includes both cash and cash management accounts.

[2] Real estate includes improved real estate, personal residence, vacant land, real estate partnerships, farm land, and real estate mutual funds.

[3] Stock includes publicly traded and closely held stock.

[4] Partnerships include limited partnerships and family limited partnerships.

[5] Bonds include State and local bonds, bond funds, Federal savings bonds, other Federal bonds, corporate bonds, and foreign bonds.

asset given overall, with female donors giving more cash than their male counterparts. Females gave a total of \$10.9 billion in cash, while male donors gave \$8.0 billion. Females transferred more cash as a percentage of their total assets than males, or 50.4 percent and 47.3 percent, respectively. When comparing real estate gifts by sex, females gave greater amounts of real estate assets, or \$4.6 billion, which was 20.0 percent of total assets given. Males gave \$3.2 billion in real estate, or 19.6 percent of total assets given. Finally, stock was the third largest asset given by both males and females, although males gave a larger portion of their total gifts, 19.5 percent, in stock. Figure G shows comparisons between the dollar amounts and percentages of assets given by men and women.

Use of Valuation Discounts

For gift tax purposes, transferred property is valued at fair market value on the date of the gift. Fair market value is the value at which property would pass from a willing seller to a willing buyer. However, the value of the property interest may be reduced, or discounted, from fair market value due to certain characteristics or qualities of the ownership interest, such as lack of control or marketability. This reduc-

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Figure G

Asset Composition of Gifts by Sex, 2005

[Money amounts are in thousands of dollars]

Female		Assets gifted	Male	
Percent of total	Amount		Percent of total	Amount
50.4	10,922,605	Cash [1]	47.3	7,950,426
21.4	4,629,750	Real estate [2]	20.0	3,368,554
16.0	3,458,007	Stock [3]	19.5	3,275,397
3.8	820,785	Partnerships [4]	5.0	832,670
2.0	435,595	Bonds [5]	1.3	215,714
1.3	278,579	Farm assets	1.9	313,399
1.3	274,331	Other non-corporate businesses	1.5	255,138
1.0	219,291	Mortgages and notes	0.6	93,471
0.7	149,691	Other mutual funds	0.4	74,174
2.2	485,997	Other	2.5	426,872
100.0	21,674,631	Total	100.0	16,805,815

[1] Cash includes both cash and cash management accounts.

[2] Real estate includes improved real estate, personal residence, vacant land, real estate partnerships, farm land, and real estate mutual funds.

[3] Stock includes publicly traded and closely held stock.

[4] Partnerships include limited partnerships and family limited partnerships.

[5] Bonds include State and local bonds, bond funds, Federal savings bonds, other Federal bonds, corporate bonds, and foreign bonds.

tion in value for tax purposes is known as “valuation discounting” and reduced the amount of taxes owed on the transfer of property.¹⁴

In 2005, valuation discounts were applied to 16.5 percent of gifts for a total of \$3.1 billion in discounts. Most rates of discount were between 20 percent and 40 percent (Figure H).

Figure H

Size of Valuation Discounts as a Percentage of Full Value of Assets

Percentage of valuation discount	Number of discounted gifts	Amount of discount
All discounted gifts	130,695	3,138,723,801
Less than 20 percent	18,247	132,683,160
20 percent under 40 percent	84,336	1,774,089,573
40 percent or higher	28,112	1,231,951,068

Donors took discounts of varying sizes, ranging from less than \$1,000 to greater than \$650,000. Donors who used discounts of \$650,000 or more took \$725.0 million in total discounts, or 23.1 percent of all discounts taken (Figure I).

Crummey Asset Donors

Under 2005 tax law, a donor may give up to \$11,000 to a single entity, person, or trust in a year without tax implications. For example, a donor may transfer \$11,000 in cash to a simple trust and not incur tax on that transfer. Two court cases, however, further expanded nontaxable gifts with the use of trust powers.

The first case, *Crummey v. Commissioner* (1968), legitimized the use of Crummey powers by exercising the idea of a “present interest.”¹⁵ Present interest means that donees have the ability to exercise rights to use gifts at the same time the gifts are transferred to them from the donor. Normally, a donor may give up to the annual exclusion to a single entity, such as a person or a trust, without tax liability. Giving more than \$11,000 to a single entity would generate a tax liability. For example, a donor may set up a simple trust for a named beneficiary in 2005 and place \$11,000 in cash assets into the trust without being taxed on that asset transfer, but a \$12,000 gift would be taxable. Using Crummey powers, however, that same donor could give more than the annual exclusion to the trust, as long as the total value given to each beneficiary was under \$11,000. Here, beneficiaries must have a present interest in the trust, shown

¹⁴ Britton Eller, Martha, “Inter Vivos Wealth Transfers, 1997 Gifts,” *Statistics of Income Bulletin*, Publication 1136, Winter 2003-2004.

¹⁵ Bittker, Boris I; Elias Clark; and Grayson McCouch (2005), *Federal Estate and Gift Taxation*. 9th edition, Thompson West, Minneapolis.

Figure I

Donors with Discounts: Full Value of Assets and Valuation Discounts, by Size of Valuation Discount

Size of valuation discount	Number of returns	Total assets, full value	Valuation discount
	(1)	(2)	(3)
Total	261,104	41,612,965,844	3,138,723,800
Less than \$1,000	226,709	30,929,289,020	421,770
\$1,000 under \$2,000	570	11,454,353	1,012,944
\$2,000 under \$3,000	794	15,420,314	1,935,883
\$3,000 under \$4,000	934	38,825,842	3,466,426
\$4,000 under \$5,000	451	10,025,827	2,045,749
\$5,000 under \$6,000	679	29,949,205	3,468,902
\$6,000 under \$7,000	1,034	50,644,991	6,734,051
\$7,000 under \$8,000	1,143	64,375,341	8,444,875
\$8,000 under \$9,000	914	53,498,448	7,770,305
\$9,000 under \$10,000	405	26,059,767	3,744,794
\$10,000 under \$20,000	6,494	535,975,306	92,412,414
\$20,000 under \$30,000	4,170	426,045,810	101,650,395
\$30,000 under \$40,000	2,511	347,048,510	85,577,702
\$40,000 under \$50,000	2,251	383,057,395	100,287,751
\$50,000 under \$100,000	4,765	1,274,167,206	333,767,813
\$100,000 under \$150,000	2,280	961,347,675	279,782,908
\$150,000 under \$200,000	1,243	928,270,105	215,077,891
\$200,000 under \$250,000	773	558,336,856	173,448,900
\$250,000 under \$300,000	539	485,427,893	149,434,871
\$300,000 under \$350,000	536	516,200,476	173,560,068
\$350,000 under \$400,000	495	556,694,080	184,171,883
\$400,000 under \$450,000	434	520,251,536	185,269,654
\$450,000 under \$500,000	123	161,393,143	57,875,669
\$500,000 under \$550,000	182	257,922,210	95,266,885
\$550,000 under \$600,000	109	160,693,822	62,212,308
\$600,000 under \$650,000	136	201,316,106	84,919,222
\$650,000 and above	430	2,109,274,606	724,961,764

by having reasonable time to exercise the power to remove assets. Thus, the same donor who gave \$11,000 to a single entity could now give \$33,000 to the same trust as long as there were three beneficiaries who exhibit present interests, which is shown by donees having the option of removing and using gifted assets at the time of transfer.

The second case went further by expanding the scope of beneficiaries who may exercise Crummey powers. In *Cristofani's Estate v. Commissioner* (1991), the court ruled that contingent remainder beneficiaries, usually a grandchild or second-generation beneficiary named by the trust, could also be treated as having present interests, maintaining that they were also given adequate time to exercise their right to remove their portions of assets from the trust.¹⁶

SOI tabulates data on returns that report Crummey powers. In 2005, a total of \$1.6 billion of assets was given to trusts that claimed Crummey powers, or single entity trusts that received gifts of greater than the annual exclusion. Cash, at \$1.0 billion, was the most utilized asset for these trusts. The second largest asset type for which these powers were used was stock, for a total of \$268.8 million in stock gifts. Finally, real estate transfers to trusts with Crummey powers had the third highest use (Figure J).

Figure J

Asset Composition of Gifts for Crummey Powers Donors, 2005

[Money amounts are in thousands of dollars]

Asset type	Amount
Cash	1,042,574
Stock	268,810
Real estate	114,080
Partnerships	81,930
Other noncorporate assets	33,089
Other	32,020
Other mutual funds	8,646
Farm assets	1,566
Mortgages and notes	1,450
Bonds	684

Data demonstrating the types of trusts using Crummey powers are shown in Figure K. Not surprisingly, simple trusts comprise the majority of trusts using Crummey powers, for a total of 36 percent. Second are family trusts, which comprise 23 percent of trusts using Crummey powers.

Summary

A total of 261,104 gift returns were filed in 2006 for gifts given in 2005. A total of \$38.5 billion in assets were transferred from donors to donees. As a result, \$1.7 billion in gift tax liability were reported. Only 2.9 percent of returns were taxable.

Females represented 47.3 percent of the donee population, while males represented 46.3 percent. The remaining 6.4 percent represented trusts and donees with unknown identities. Gifts of cash were the preferred choice for both female and male donors; cash assets comprised 49.0 percent of total gifts.

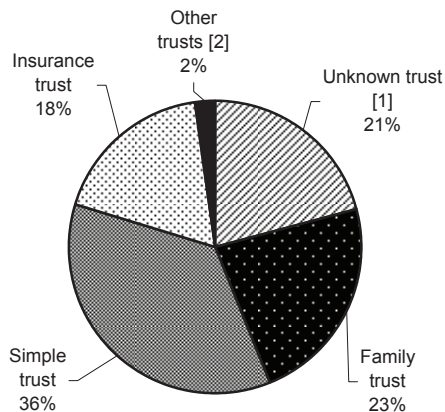
¹⁶ Ibid.

Wealth Transfers, 2005 Gifts

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Figure K

Trusts Utilizing Crummey Powers, 2005



[1] Unknown trust types include trusts in which the taxpayer does not specify the type of trust on Form 709.

[2] Other trust types include: generation-skipping trusts, marital trusts, personal residence trusts, charitable remainder unitrusts, grantor retained annuity trusts, and 529 educational trusts.

Following cash, real estate was the second most frequently gifted asset, in 20.8 percent of asset transfers.

In 2005, donors used a variety of mechanisms to complete their transfers of assets. Direct gifts comprised the bulk of transfers, as 76.3 percent of gifts were given outright.

Data Sources and Limitations

The data used for this article are based on a sample of 9,037 gift tax returns that were filed in 2006. The majority of the returns filed in 2006, approximately 95 percent, recorded gifts given in 2005. Therefore, these returns can be used to represent the behaviors of gift-givers in 2005.

The sample design for the study is a stratified probability sample with two stratifying variables: taxability status and size of total gifts (prior to the subtraction of annual exclusions and deductions in the calculation of total taxable gifts). Taxability status is divided into two categories: nontaxable (i.e., no gift tax liability reported) and taxable (i.e., gift tax liability reported). The second stratifier, size of total gifts, is divided into four or five categories, depending on taxability status. Each stratum is labeled with a sample code.

Each return in the sample is weighted to reflect its share of the population of returns filed in 2006. Because of the variation of the sample sizes, post-stratification is used. The post-stratified weight is computed by dividing the realized population count of filed returns in a given stratum by the realized number of sample returns in that stratum. These weights are adjusted for missing returns, rejected returns, and outliers. These weights are applied to the sample data to produce aggregate estimates for items of interest, such as total gifts and total taxes.

Explanation of Selected Terms

Brief definitions of some terms used in text and figures are provided below:

Beneficiary—The recipient of income or assets from a trust, will, or life insurance policy.

Cash management accounts—Also known as financial or asset management accounts, these are accounts offered by brokerages. Money in the account can be invested in various assets, and check-writing privileges are normally part of the account.

Charitable deduction—An unlimited charitable deduction is available for all outright transfers to qualified charities. The deduction is available for gifts to trust only if the trust meets certain requirements.

Contingent beneficiary—A contingent beneficiary is one whose bequest is reliant on some occurrence outside the control of the transferor. It often refers to an eventual beneficiary of property in which someone else has a life interest. The bequest in such a case is contingent on: (1) the contingent beneficiary living longer than the person with the life interest, and (2) there being some property left for the contingent beneficiary to inherit.

Crummey power—Under current gift tax law, the gift tax exclusion is only available on gifts of present, not future, interests. Therefore, when a trust is created as a life and a remainder interest, the remainder interest is not eligible for the gift tax exclusion. The Crummey Power allows a person with a future interest in the trust to withdraw up to the annual exclusion amount from the trust for a short period every year. This converts the future interest into a present interest, making the exclusion available.

Direct trust—A direct trust is an express trust, as distinguished from a constructive or implied trust.

An express trust is created or declared in express terms, usually in writing, as distinguished from one inferred by law from the conduct or dealings of the parties. It is directly created for specific purposes in contrast to a constructive or resulting trust, which is created by direct and positive acts of the parties, by some writing or deed, or will, or by words expressly or implicitly evincing an intention to create a trust.

Generation-Skipping (transfer) taxes—The 1976 Tax Reform Act imposes a generation-skipping transfer tax on: (1) transfers under trusts (or similar arrangements) having beneficiaries in more than one generation below that of the transferor, and (2) direct transfers to beneficiaries more than one generation below that of the transferor. The tax is imposed (with certain exemptions) on the occurrence of any one of three taxable events: a taxable termination, a taxable distribution (including distributions of income), and a direct skip (an outright transfer to or for the benefit of a person at least two generations below that of the transferor).

Insurance trust—A trust set up with the proceeds of a life insurance policy.

Net gift tax—This is the reported value of gift tax on current period gifts.

Nontaxable returns—Gift tax returns on which taxpayers reported no net gift tax liability.

Partnership—A type of business entity in which two or more people pool their funds and talents and share in the profits and losses of an enterprise.

Taxable gifts, current period—These are the amount of taxable gifts—total gifts less exclusions and deductions—for the current tax year.

Taxable gifts, prior period—These are the amount of taxable gifts—total gifts less exclusions and deductions—for all prior tax years in which the donor transferred property.

Taxable returns—Gift tax returns on which taxpayers reported a net gift tax liability.

Total gifts—These are the value of total gifts reported by the donor after gifts have been split between the donor and the consenting spouse.

Total gifts of donor—These are the dollar value of gifts given by the donor during the current tax year and reported on Schedule A of Form 709. Gifts include those subject to gift tax only and those subject to both gift and generation-skipping transfer taxes.

Total taxable gifts, all periods—These are the amount of taxable gifts—total gifts less exclusions and deductions—for all periods, both prior and current.

Trust—A trust is an arrangement whereby the right to property is held by one party, the “trustee” (or manager), for the benefit of another (the “beneficiary”). The person who sets up the trust (and provides its assets) is called the “grantor.”

The Credit for Increasing Research Activities: Statistics from Tax Years 2004-2005

by Eurry Kim

The Economic Recovery Tax Act of 1981 furnished the groundwork for the current version of Form 6765, *Credit for Increasing Research Activities*. The 1981 credit was 25 percent of either the difference between current research spending and the average of the 3 prior years' spending on qualified research or half of current research spending, whichever was less. Now known as the Section A—Regular Credit, it is a 20-percent credit taken on marginal increases of research spending based on historical research spending and average sales relationships.

After substantive modifications to the credit calculation in 1990 and 1996, the method of figuring the credit generally remained uniform. The Omnibus Budget Reconciliation Act of 1989 integrated gross receipts as a factor in the tax credit calculation starting in Tax Year 1990. Rather than being based solely on amounts of historic research spending, research intensity (an expression of qualified research spending relative to gross receipts) became the new method by which one section of the tax credit was (and still continues to be) calculated. Then, starting in Tax Year 1996 through the current year, the Small Business Job Protection Act of 1996 introduced a credit based on a three-tiered percentage calculation. Dubbed the Section B—Alternative Incremental Credit, it is an opportunity for those taxpayers ineligible to claim the Section A—Regular Credit.

Although the Section B credit employs a several-layered process involving multiple rates, the Section A credit uses a measurement of base sensitivity. The base is calculated by multiplying the corporation's 4-year average annual gross receipts by its fixed base percentage. The fixed base percentage is an historical ratio of qualified research spending to gross receipts; it is restricted to a maximum of 16 percent. The base mimics what a corporation would spend if there were no credit. Line 14 on the 2004 revision of Form 6765 and line 15 on the 2005 revision of Form 6765 provide the junction between the two determinant categories of the base calculation. A corporation is said to have been subject to the excess base limitation when the excess between current research spend-

ing and spending based on an historically-established research intensity does not exceed 50 percent of current research spending. The excess base is a measure of a marginally increased investment in research and experimentation. Otherwise, a corporation is said to have been subject to the 50-percent limitation. A corporation is disqualified from taking the credit toward qualified research expenses if its base does not exceed 50 percent of its current research spending.

Summary Statistics—Tax Years 2001-2005

The tax credit information provided in the following figures and charts include only data provided by C corporations (i.e., excluding passthrough entities, such as S corporations, RICs, and REITs).

In Tax Year 2005, the number of claimants of the credit increased over 10 percent from the previous year. The credit amount claimed in Tax Year 2005 amounted to almost \$6.4 billion, an increase of 14.6 percent over the previous year (Figure A).

Figure A

Credit for Increasing Research Activities: Annual Percentage Increase or Decrease for Tax Years 2001-2005

Year	Number of credit claimants	Percentage change	Credits claimed (in millions of dollars)	Percentage change
	(1)	(2)	(3)	(4)
2001	10,389	-1.0%	6,356	-10.2%
2002	10,254	-1.3%	5,656	-11.0%
2003	10,369	1.1%	5,488	-3.0%
2004	10,244	-1.2%	5,554	1.2%
2005	11,290	10.2%	6,363	14.6%

Companies with business receipts ranging from \$10 million to less than \$50 million claimed the credit most frequently (Figure B). Over the years, the trend of the number of claimants across business receipt sizes stayed generally consistent. Corporations with business receipts ranging from \$10 million up to \$50 million maintained a consistent lead in the number of credits claimed. Additionally, the number of claimants exceeding \$250 million in business receipts mirrored the number of claimants in the range

Eurry Kim is an economist with the Corporation Research Section. This article was prepared under the direction of Ken Szefflinski, Chief.

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Figure B

Credit for Increasing Research Activities: Number of Credit Claimants, by Size of Business Receipts, Tax Years 2001-2005

Size of business receipts	Year				
	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)
Total	10,389	10,254	10,369	10,244	11,290
Under \$25,000	1,576	1,019	1,231	1,313	1,595
\$25,000 under \$100,000	569	730	296	184	224
\$100,000 under \$250,000	355	247	378	391	346
\$250,000 under \$500,000	264	425	698	666	827
\$500,000 under \$1,000,000	352	503	465	497	585
\$1,000,000 under \$2,500,000	1,292	1,203	1,412	1,045	1,142
\$2,500,000 under \$5,000,000	1,066	1,391	1,150	1,081	998
\$5,000,000 under \$10,000,000	1,111	1,048	926	1,026	1,179
\$10,000,000 under \$50,000,000	1,857	1,777	1,806	1,884	2,047
\$50,000,000 under \$100,000,000	495	452	502	570	623
\$100,000,000 under \$250,000,000	493	492	492	515	535
\$250,000,000 or more	961	966	1,014	1,072	1,191

of the smaller \$10 million to \$50 million business receipts class.

The credit amounts, however, were largely distributed to companies with the largest business receipts, which exceeded \$250 million (Figure C). These companies claimed nearly 80 percent of the credits. For the most part, total credit amounts

claimed for any other class of business receipts did not exceed even 10 percent of the total credit amount claimed by corporations with the largest business receipts class.

Over 88 percent of the corporations claiming the \$6.4-billion credit used the Section A—Regular Credit method in Tax Year 2005. As previously mentioned,

Figure C

Credit for Increasing Research Activities: Claimed Credit Amounts, by Size of Business Receipts, Tax Years 2001-2005

[Money amounts are in thousands of dollars]

Size of business receipts	Year				
	2001	2002	2003	2004	2005
	(1)	(2)	(3)	(4)	(5)
Total	6,355,803	5,655,666	5,488,337	5,554,011	6,363,476
Under \$25,000	319,354	29,249	187,890	180,051	199,665
\$25,000 under \$100,000	28,687	30,196	21,410	21,261	19,753
\$100,000 under \$250,000	30,285	28,470	30,129	32,850	27,140
\$250,000 under \$500,000	38,322	143,945	41,936	35,878	31,664
\$500,000 under \$1,000,000	51,642	113,645	46,743	38,183	38,823
\$1,000,000 under \$2,500,000	99,313	231,153	77,527	74,758	71,645
\$2,500,000 under \$5,000,000	112,112	172,516	91,323	78,147	78,395
\$5,000,000 under \$10,000,000	125,600	166,937	98,273	116,197	114,133
\$10,000,000 under \$50,000,000	383,748	252,303	319,814	297,082	295,652
\$50,000,000 under \$100,000,000	147,900	259,455	163,752	140,212	152,216
\$100,000,000 under \$250,000,000	374,751	754,958	245,095	284,713	312,249
\$250,000,000 or more	4,644,089	3,472,840	4,164,445	4,254,680	5,022,141

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base sensitivity is a central measurement of the Section A—Regular Credit. From Tax Years 2001 to 2002, the percentage of C corporations subject to the Excess Base Limitation increased from 15.0 percent to 20.8 percent (Figure D). Smaller percentage increases occurred in subsequent tax years. The vast majority of Section A credit claimants, though, were subject to the 50-percent limitation and calculated their credits factoring in only half of their current research spending. This large share of corporations has nevertheless been waning over the years.

The bulk of credit claimants came from corporations involved in manufacturing (Figure E). Since Tax Year 2000, the manufacturing industry consistently comprised over 40 percent of total credit claimants. By Tax Year 2004, manufacturing made 46 percent of all of the credit claims. But in Tax Year 2005, manufacturing credit claims decreased to 44 percent. Of subsectors included in manufacturing,

computer and electronic product manufacturing made the largest number of credit claims for both tax years.

Over half of the credit amounts were consistently attributable to the manufacturing industry from Tax Years 2000 to 2005. In Tax Year 2005, 71.2 percent of the \$6.4-billion credit went to manufacturing (Figure F). In Tax Year 2004, 69.2 percent of the \$5.6-billion credit went to manufacturing. For both tax years, computer and electronic product manufacturing claimed the largest total credit.

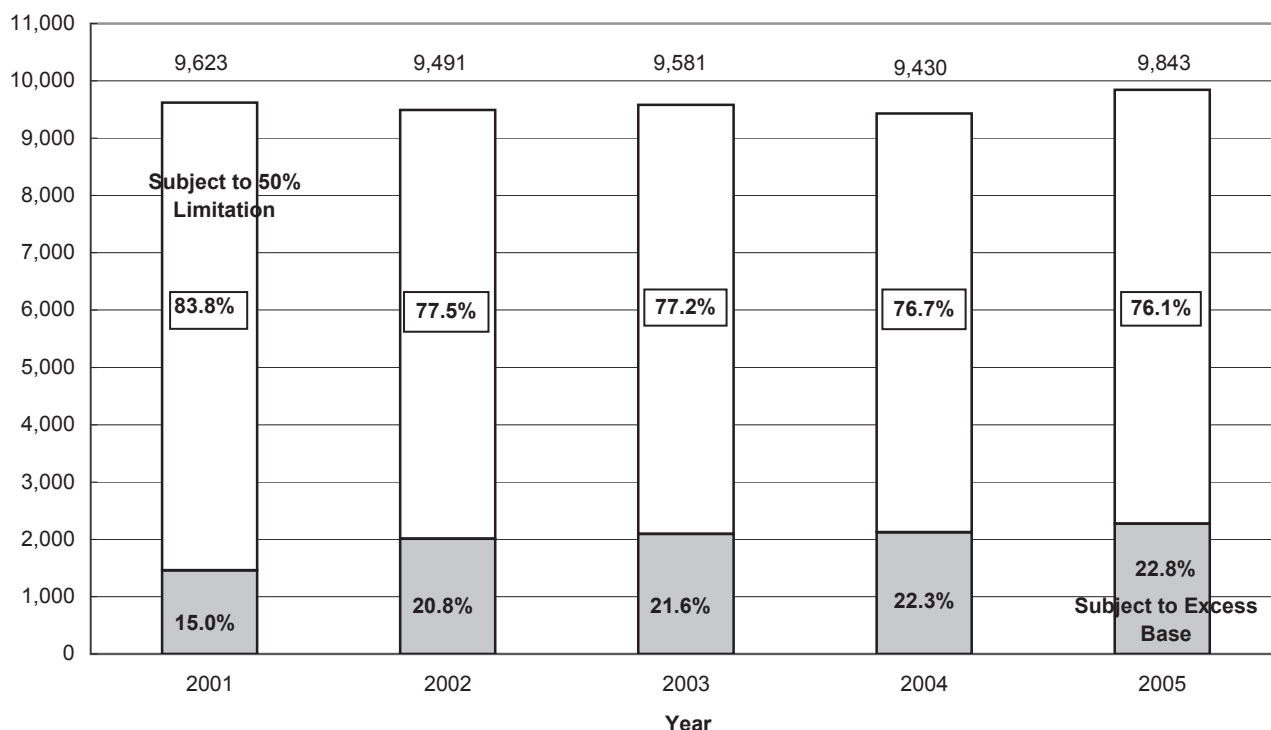
Observations and Analyses of the Data

Observations of data from corporation Forms 6765 revealed several issues in credit classifications and legitimate credit claims. Since corporations are not legally required to complete tax returns in their entirety, assumptions were made to assess the data in meaningful ways.¹

Figure D

Credit for Increasing Research Activities: Section A Credit Claimants, Base-Sensitivity, Tax Years 2001-2005

Number of Section A credit claimants



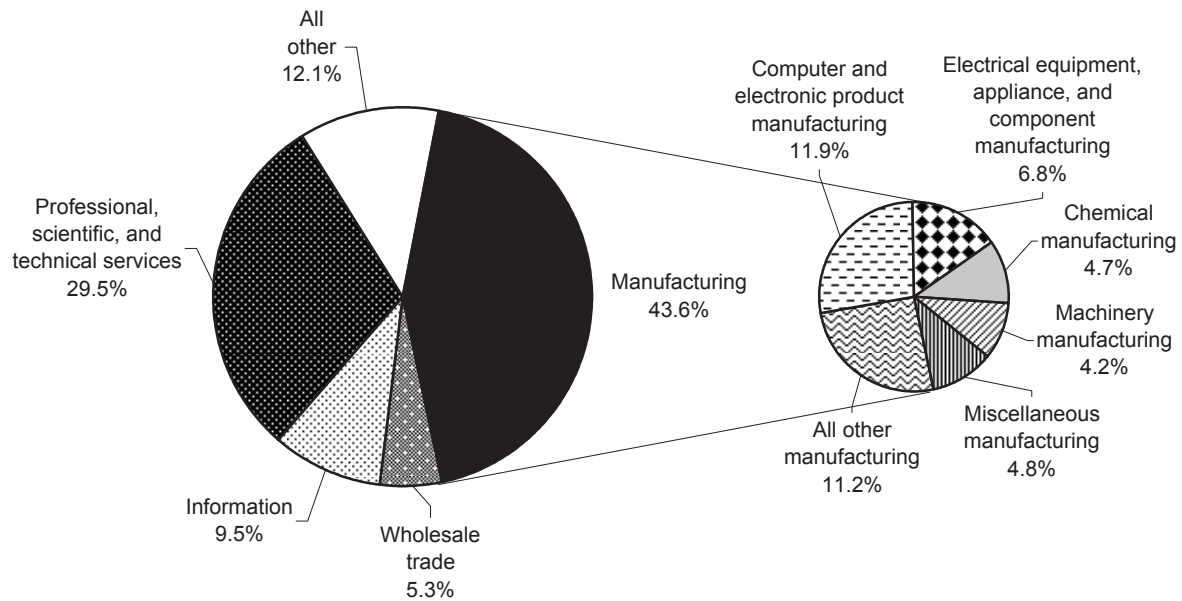
¹ For similar general issues regarding the description of the Corporate Statistics of Income sample and limitations of the data, see section 3 of the 2005 *Corporation Complete Report*. Link: <http://www.irs.gov/taxstats/bustaxstats/article/0,,id=112834.00.html>.

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Figure E

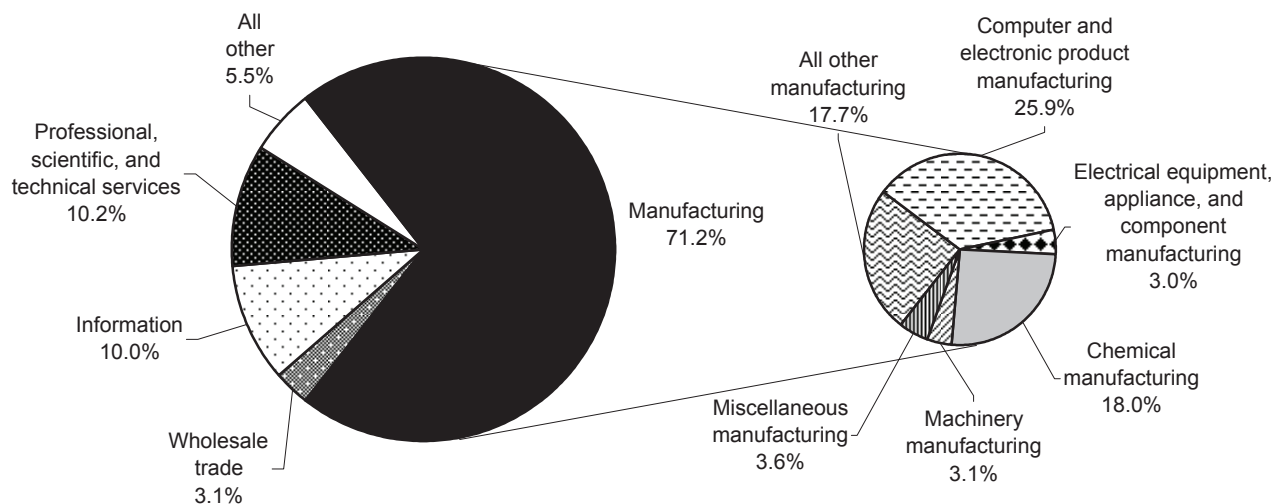
Number of Credit Claimants for Increasing Research Activities, by Industrial Sectors, Tax Year 2005



NOTE: Detail may not add to 100 percent because of rounding.

Figure F

Credit Amounts Claimed for Increasing Research Activities, by Industrial Sectors, Tax Year 2005



NOTE: Detail may not add to 100 percent because of rounding.

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Research Credit Claims, Defined

The only data that were considered were for Form 6765 filers claiming a Current Year Credit.² Due to data processing procedures and filing circumstances, these data show notable exceptions.

In hundreds of cases, corporations filed a Form 6765 but did not actually claim any credit amount. That is, corporations filled in component data on the tax form and probably concluded ineligibility for one reason or another. This disqualification could have stemmed from insufficient spending on qualified research to exceeding an allowable credit limit. Since credits were unable to be claimed in these cases, data from these forms were not included in the tables.

Assigning Methods of the Research Credit Calculation

Credit methods (e.g., Section A or Section B) were derived from comparisons among three different Form 6765 line items. Generally, while taking passthrough research credits into account, whenever the Current-Year Credit was equal to either the Regular Credit³ or the Alternative Incremental Credit,⁴ the coordinating credit method was assigned.⁵ However, exceptions to this simple procedure were made to accommodate legitimate credit data.

In fact, the current-year credit did not have to equal either the Section A—Regular Credit or the Section B—Alternative Incremental Credit to be included in data tables. For the few cases where both Regular Credit and Alternative Incremental Credit line items were blank, the existence of data on any one line item within either credit method funneled that particular corporation's credit under that particular credit method. Such a form may have provided information on Section A total qualified research spending,⁶ Section A average annual gross receipts,⁷ and the current-year credit. Thus, even though the Section A—Regular Credit line item was left blank, the form could be classified as a Section A claimant for Section A credit.

In many cases, corporations assigned as having taken Section A—Regular Credit also filled out component data for Section B—Alternative Incremental

Credit. According to taxpayer instructions for both Revision Years 2004 and 2005, taxpayers were advised to figure the credit using both calculation methods and claim the larger credit. All filers who did so and had information within both sections were classified as Section A credits.⁸

There were, however, claimants that could not be determined categorically. A number of corporations simply specified current-year credit amounts with no additional detail. Some showed the entire credit coming from passthrough entities⁹ (including partnerships, S corporations, estates, or trusts). The only information provided by these forms came from the summary, Section C. Credit calculation methods, therefore, could not be reliably assigned.

Summary

After unremarkable changes in the use of Form 6765 during Tax Years 2001 through 2004, there was an increase in Tax Year 2005. Both the number of claimants and the amount of credits grew. The manufacturing industry held a clear lead in taking advantage of the credits throughout these years. Most of the credits were claimed by four manufacturing subsectors, including computer and electronic product manufacturing; electrical equipment, appliance, and component manufacturing; chemical manufacturing; and machinery manufacturing. Companies with the largest class of business receipts (exceeding \$250 million) also maintained the lion's share of credits throughout Tax Years 2001 to 2005. The addition of a new credit-calculating method (Section C—Alternative Simplified Credit) in Tax Year 2006 should provide another interesting dimension to the composition of claimants for the Credit for Increasing Research Activities.

This finding is drawn from ...

Data extracted from corporation tax returns for 2001-2005. Aggregate data referenced in this finding for the Research Credit, in addition to 20 analytical tables from 2003-2005, can be found online at www.irs.gov/taxstats. Follow the "Corporations" link and then navigate to "Corporation Research Credit."

² Line 41 on the 2004 revision and line 43 on the 2005 revision.

³ Line 16 on the 2004 revision and line 17 on the 2005 revision.

⁴ Line 39 on the 2004 revision and line 41 on the 2005 revision.

⁵ Nonzero credit amounts aside, there were no cases in which both credit-calculating methods gave equal amounts.

⁶ Line 8 on the 2004 revision and line 9 on the 2005 revision.

⁷ Line 10 on the 2004 revision and line 11 on the 2005 revision.

⁸ This is shown by comparing the three separate parts of Tables 1 and 2. Section A credit component data remain consistent across the total data tables, while select Section B component credit data increase from the Section B data to the total tables (despite the number of credit claimants remaining the same).

⁹ Line 40 on the 2004 revision and line 42 on the 2005 revision.

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Table 1. Corporations Claiming a Credit for Increasing Research Activities on Form 6765 [1]: Selected Items, by Sectors, Tax Year 2004

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

Item	All sectors	Sectors			
		Agriculture, forestry, fishing, and hunting	Mining	Utilities	Construction
	(1)	(2)	(3)	(4)	(5)
Number of returns claiming a credit on Form 6765 [2]	10,244	40	22	17	21
Section A—Regular Credit					
1 Basic research payments paid or incurred	161,627	421	0	8	3,675
2 Qualified organization base period amount	166,818	[3]	3,464	2	1,838
4 Wages for qualified services	54,573,366	46,402	45,279	41,540	86,248
5 Cost of supplies	13,566,810	13,145	17,834	37,832	14,106
6 Rental or lease costs of computers	151,619	0	1,318	0	873
7 Applicable percentage of contract research expense	13,720,594	6,689	20,441	95,326	14,945
8 Total qualified research expenses (sum 4-7) [4]	84,021,173	66,236	84,872	174,698	116,172
10 Average annual gross receipts [5]	10,478,876,046	4,271,612	4,842,272	45,394,185	22,513,368
11 Base amount	36,688,818	33,672	25,742	83,735	58,956
16 Regular credit [6]	4,845,193	3,334	4,227	10,163	4,707
Section B—Alternative Incremental Credit [7]					
17 Basic research payments paid or incurred	25,731	0	d	0	0
18 Qualified organization base period amount	11,837	0	d	0	0
21 Wages for qualified services	24,066,503	14,401	d	0	0
22 Cost of supplies	4,913,043	5,885	d	0	0
23 Rental or lease cost of computers	8,433	0	d	0	0
24 Applicable percentage of contract research expense	3,191,919	351	d	0	0
25 Total qualified research expenses (sum 21-24) [4]	32,110,726	20,637	d	0	0
26 Average annual gross receipts [5]	634,904,221	316,415	d	0	0
39 Alternative incremental credit [6]	657,416	408	d	0	0
Section C—Current-Year Credit					
40 Passthrough rsrch cr(s) from prtshp, S corp, est, or trust	106,213	478	108	78	177
41 Current-year credit for Increasing research activities [2]	5,554,011	4,220	6,937	10,241	4,884

Footnotes at end of table.

The Credit for Increasing Research Activities

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Table 1. Corporations Claiming a Credit for Increasing Research Activities on Form 6765 [1]: Selected Items, by Sectors, Tax Year 2004—Continued

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

Item	Sectors—continued				
	Manufacturing	Wholesale and retail trade	Transportation and warehousing	Information	Finance and insurance
	(6)	(7)	(8)	(9)	(10)
Number of returns claiming a credit on Form 6765 [2]	4,686	812	23	977	142
Section A—Regular Credit					
1 Basic research payments paid or incurred	104,847	8,825	d	11,078	22
2 Qualified organization base period amount	132,451	4,018	d	4,310	17
4 Wages for qualified services	36,699,034	2,694,792	d	5,942,542	1,530,738
5 Cost of supplies	11,632,013	440,580	d	174,397	13,275
6 Rental or lease costs of computers	102,245	17,520	d	11,736	34
7 Applicable percentage of contract research expense	8,705,377	840,151	d	1,473,157	512,585
8 Total qualified research expenses (sum 4-7) [4]	58,330,162	3,993,042	d	8,434,608	2,056,627
10 Average annual gross receipts [5]	1,840,816,143	373,728,368	d	323,259,558	7,397,225,600
11 Base amount	29,378,855	1,615,064	d	2,846,021	671,457
16 Regular credit [6]	3,316,629	200,157	d	497,175	111,162
Section B—Alternative Incremental Credit [7]					
17 Basic research payments paid or incurred	24,015	174	d	0	d
18 Qualified organization base period amount	10,199	10	d	0	d
21 Wages for qualified services	18,566,351	380,606	d	4,284,428	d
22 Cost of supplies	4,657,722	29,143	d	56,019	d
23 Rental or lease cost of computers	8,376	0	d	56	d
24 Applicable percentage of contract research expense	2,715,036	96,875	d	238,849	d
25 Total qualified research expenses (sum 21-24) [4]	25,961,190	506,623	d	4,496,474	d
26 Average annual gross receipts [5]	531,467,696	16,032,729	d	62,718,310	d
39 Alternative incremental credit [6]	533,213	7,923	d	91,504	d
Section C—Current-Year Credit					
40 Passthrough rsrch cr(s) from prtshp, S corp, est, or trust	54,415	2,785	8	6,980	310
41 Current-year credit for Increasing research activities [2]	3,845,792	211,484	11,515	599,795	111,678

The Credit for Increasing Research Activities

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Table 1. Corporations Claiming a Credit for Increasing Research Activities on Form 6765 [1]: Selected Items, by Sectors, Tax Year 2004—Continued

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

Item	Sectors—continued				
	Real estate, rental, and leasing	Professional, scientific, and technical services	Management of companies (holding companies)	Administrative and support and waste management services	Various services [8]
	(11)	(12)	(13)	(14)	(15)
Number of returns claiming a credit on Form 6765 [2]	8	3,304	70	23	99
Section A—Regular Credit					
1 Basic research payments paid or incurred	d	29,436	[3]	0	3,316
2 Qualified organization base period amount	d	18,627	0	0	2,092
4 Wages for qualified services	d	6,368,252	584,475	180,077	213,802
5 Cost of supplies	d	1,137,015	250	16,451	67,020
6 Rental or lease costs of computers	d	17,689	0	0	204
7 Applicable percentage of contract research expense	d	1,645,960	240,492	13,570	95,168
8 Total qualified research expenses (sum 4-7) [4]	d	9,169,173	825,217	194,360	376,194
10 Average annual gross receipts [5]	d	175,301,419	172,240,989	8,860,357	35,448,225
11 Base amount	d	1,712,326	69,039	73,779	50,997
16 Regular credit [6]	d	587,670	53,309	18,252	25,866
Section B—Alternative Incremental Credit [7]					
17 Basic research payments paid or incurred	d	1,543	0	d	0
18 Qualified organization base period amount	d	1,629	0	d	0
21 Wages for qualified services	d	652,035	0	d	8,426
22 Cost of supplies	d	113,193	0	d	1,342
23 Rental or lease cost of computers	d	0	0	d	0
24 Applicable percentage of contract research expense	d	114,443	0	d	698
25 Total qualified research expenses (sum 21-24) [4]	d	879,671	0	d	10,467
26 Average annual gross receipts [5]	d	17,685,174	0	d	201,595
39 Alternative incremental credit [6]	d	20,357	0	d	196
Section C—Current-Year Credit					
40 Passthrough rsrch cr(s) from prtshp, S corp, est, or trust	0	2,050	38,699	113	14
41 Current-year credit for Increasing research activities [2]	1,120	609,019	92,007	18,956	26,363

d—Amounts have been deleted to avoid disclosure of information for certain companies.

[1] Includes returns of active corporations, other than Forms 1120S, 1120-REIT, and 1120-RIC.

[2] Number of credit claimants and Line 41 include corporations that only reported data on Line 41.

[3] An amount less than \$500 was present before rounding.

[4] Lines 8 and 25 do not equal the sum of their components as shown in this table, because some corporations only reported these total lines.

[5] Lines 10 and 26, Average annual gross receipts, are defined as the average annual gross receipts for the 4 tax years preceding the tax year for which the credit is being determined.

[6] Lines 16 and 39 include credit amounts for which some corporations did not provide component data.

[7] Component data for Section B include Section A credit claimants who also filled in information in Section B.

[8] "Various Services" include educational services; health care and social assistance; arts, entertainment, and recreation; accommodation and food services; and other services.

The Credit for Increasing Research Activities

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Table 2. Corporations Claiming a Credit for Increasing Research Activities on Form 6765 [1]: Selected Items, by Sectors, Tax Year 2005

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

Item	All sectors	Sectors			
		Agriculture, forestry, fishing, and hunting	Mining	Utilities	Construction
	(1)	(2)	(3)	(4)	(5)
Number of returns claiming a credit on Form 6765 [2]	11,290	61	19	37	18
Section A—Regular Credit					
1 Certain amounts paid/incurred to energy consortia after 8/8/05	43,223	0	0	41,945	0
2 Basic research payments paid or incurred	259,496	379	0	0	177
3 Qualified organization base period amount	464,596	11	0	2	89
5 Wages for qualified services	64,805,322	43,483	38,680	61,264	30,954
6 Cost of supplies	15,678,591	10,741	8,191	56,651	7,219
7 Rental or lease costs of computers	63,317	114	0	1	0
8 Applicable percentage of contract research expense	15,694,630	7,425	3,069	98,003	18,624
9 Total qualified research expenses (sum 5-8) [3]	96,520,705	61,763	49,940	215,918	56,798
11 Average annual gross receipts [4]	52,786,116,098	6,364,075	2,681,573	90,500,058	10,487,317
12 Base amount	39,408,039	19,101	19,947	193,698	14,180
17 Regular credit [5]	5,596,162	3,390	2,661	18,116	3,319
Section B—Alternative Incremental Credit [6]					
18 Certain amounts paid/incurred to energy consortia after 8/8/05	9,929	0	d	d	0
19 Basic research payments paid or incurred	21,540	0	d	d	0
20 Qualified organization base period amount	209,547	0	d	d	0
23 Wages for qualified services	24,452,777	*16,173	d	d	0
24 Cost of supplies	5,303,772	*6,139	d	d	0
25 Rental or lease cost of computers	6,471	0	d	d	0
26 Applicable percentage of contract research expense	3,567,167	*1,332	d	d	0
27 Total qualified research expenses (sum 23-26) [3]	33,330,249	*23,644	d	d	0
28 Average annual gross receipts [4]	661,784,696	*286,575	d	d	0
41 Alternative incremental credit [5]	633,914	*496	d	d	0
Section C—Current-Year Credit					
42 Passthrough rsrch cr(s) from prtshp, S corp, est, or trust	136,220	156	46	108	104
43 Current-year credit for Increasing research activities [2]	6,363,476	4,183	5,408	20,454	3,424

Footnotes at end of table.

The Credit for Increasing Research Activities

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Table 2. Corporations Claiming a Credit for Increasing Research Activities on Form 6765 [1]: Selected Items, by Sectors, Tax Year 2005—Continued

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

Item	Sectors—continued				
	Manufacturing	Wholesale and retail trade	Transportation and warehousing	Information	Finance and insurance
	(6)	(7)	(8)	(9)	(10)
Number of returns claiming a credit on Form 6765 [2]	4,921	718	43	1,076	143
Section A—Regular Credit					
1 Certain amounts paid/incurred to energy consortia after 8/8/05	1,279	0	0	0	0
2 Basic research payments paid or incurred	202,484	8,648	0	875	10,339
3 Qualified organization base period amount	199,621	14,869	0	60,923	4,882
5 Wages for qualified services	44,733,527	3,088,635	93,907	7,741,835	1,374,218
6 Cost of supplies	13,512,335	607,627	2,173	138,469	12,543
7 Rental or lease costs of computers	34,171	14,105	0	6,613	277
8 Applicable percentage of contract research expense	9,852,427	928,108	42,303	1,810,305	564,471
9 Total qualified research expenses (sum 5-8) [3]	68,257,544	4,638,496	138,384	9,813,031	1,951,508
11 Average annual gross receipts [4]	1,838,706,514	351,591,497	87,558,936	421,684,728	49,523,187,675
12 Base amount	31,305,001	1,930,322	61,349	3,446,728	321,292
17 Regular credit [5]	3,952,299	216,440	8,699	549,464	121,605
Section B—Alternative Incremental Credit [6]					
18 Certain amounts paid/incurred to energy consortia after 8/8/05	0	0	d	0	0
19 Basic research payments paid or incurred	9,360	641	d	0	10,634
20 Qualified organization base period amount	29,500	174,122	d	0	5,472
23 Wages for qualified services	18,457,193	538,110	d	4,068,832	103,543
24 Cost of supplies	4,966,692	86,767	d	57,402	3,283
25 Rental or lease cost of computers	6,423	0	d	48	0
26 Applicable percentage of contract research expense	2,950,505	199,560	d	233,653	15,917
27 Total qualified research expenses (sum 23-26) [3]	26,380,812	824,423	d	4,359,935	122,744
28 Average annual gross receipts [4]	555,281,861	17,831,545	d	54,001,995	4,279,687
41 Alternative incremental credit [5]	488,145	15,240	d	90,520	2,518
Section C—Current-Year Credit					
42 Passthrough rsrch cr(s) from prtshp, S corp, est, or trust	81,739	5,241	330	5,164	550
43 Current-year credit for Increasing research activities [2]	4,529,302	235,402	9,040	636,462	124,607

Footnotes at end of table.

The Credit for Increasing Research Activities

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Table 2. Corporations Claiming a Credit for Increasing Research Activities on Form 6765 [1]: Selected Items, by Sectors, Tax Year 2005—Continued

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

Item	Sectors—continued				
	Real estate, rental, and leasing	Professional, scientific, and technical services	Management of companies (holding companies)	Administrative and support and waste management services	Various services [7]
	(11)	(12)	(13)	(14)	(15)
Number of returns claiming a credit on Form 6765 [2]	14	3,335	326	420	160
Section A—Regular Credit					
1 Certain amounts paid/incurred to energy consortia after 8/8/05	0	0	0	0	0
2 Basic research payments paid or incurred	0	34,833	0	0	1,760
3 Qualified organization base period amount	0	175,873	7,436	0	891
5 Wages for qualified services	73,173	6,537,210	562,723	154,442	271,271
6 Cost of supplies	7,650	1,237,571	8,730	12,232	56,458
7 Rental or lease costs of computers	284	6,882	332	193	348
8 Applicable percentage of contract research expense	15,590	1,931,924	270,322	35,631	116,429
9 Total qualified research expenses (sum 5-8) [3]	96,696	9,751,516	842,107	202,498	444,506
11 Average annual gross receipts [4]	3,679,967	141,331,509	284,810,031	8,371,735	15,160,483
12 Base amount	31,330	1,756,819	147,936	86,376	73,959
17 Regular credit [5]	4,210	619,178	54,222	10,118	32,442
Section B—Alternative Incremental Credit [6]					
18 Certain amounts paid/incurred to energy consortia after 8/8/05	d	0	0	d	0
19 Basic research payments paid or incurred	d	906	0	d	0
20 Qualified organization base period amount	d	453	0	d	0
23 Wages for qualified services	d	1,075,177	0	d	8,207
24 Cost of supplies	d	143,282	0	d	1,505
25 Rental or lease cost of computers	d	0	0	d	0
26 Applicable percentage of contract research expense	d	146,927	0	d	3,581
27 Total qualified research expenses (sum 23-26) [3]	d	1,365,386	0	d	13,292
28 Average annual gross receipts [4]	d	25,311,135	0	d	324,495
41 Alternative incremental credit [5]	d	30,286	0	d	245
Section C—Current-Year Credit					
42 Passthrough rsrch cr(s) from prtshp, S corp, est, or trust	172	1,962	40,566	37	45
43 Current-year credit for Increasing research activities [2]	4,445	651,093	94,833	11,859	32,966

* Estimate should be used with caution because of the small number of sample returns on which it was based.

d—Amounts have been deleted to avoid disclosure of information for certain companies.

[1] Includes returns of active corporations, other than Forms 1120S, 1120-REIT, and 1120-RIC.

[2] Number of credit claimants and Line 43 include corporations that only reported data on Line 43.

[3] Lines 9 and 27 do not equal the sum of their components as shown in this table, because some corporations only reported these total lines.

[4] Lines 11 and 28, Average annual gross receipts, are defined as the average annual gross receipts for the 4 tax years preceding the tax year for which the credit is being determined.

[5] Lines 17 and 41 include credit amounts for which some corporations did not provide component data.

[6] Component data for Section B include Section A credit claimants who also filled in information in Section B.

[7] "Various Services" include educational services; health care and social assistance; arts, entertainment, and recreation; accommodation and food services; and other services.

SOI Sampling Methodology and Data Limitations

This article discusses typical sampling procedures used in most Statistics of Income (SOI) programs. Aspects covered briefly include sampling criteria, selection techniques, methods of estimation, and sampling variability. Some of the nonsampling error limitations of the data are also described, as well as the tabular conventions employed.

Additional information on sample design and data limitations for specific SOI studies can be found in the separate SOI reports. More technical information is available, on request, by writing to the Director, Statistics of Income Division RAS:S, Internal Revenue Service, P.O. Box 2608, Washington, DC 20013-2608.

Sample Criteria and Selection of Returns

Statistics compiled for the SOI studies are generally based on stratified probability samples of income tax returns or other forms filed with the Internal Revenue Service (IRS). The statistics do not reflect any changes made by the taxpayer through an amended return or by the IRS as a result of an audit. As returns are filed and processed for tax purposes, they are assigned to sampling classes (strata) based on such criteria as: industry, presence or absence of a tax form or schedule, and various income factors or other measures of economic size (such as total assets, total receipts, size of gift, and size of estate). The samples are selected from each stratum over the appropriate filing periods. Thus, sample selection can continue for a given study for several calendar years—3 for corporations because of the incidence of fiscal (noncalendar) year reporting and extensions of filing time. Because sampling must take place before the population size is known precisely, the rates of sample selection within each stratum are fixed. This means, in practice, that both the population and the sample size can differ from those planned. However, these factors do not compromise the validity of the estimates.

The probability of a return's selection depends on its sample class or stratum and may range from a fraction of 1 percent to 100 percent. Considerations in determining the selection probability for each stratum include the number of returns in the stratum, the diversity of returns in the stratum, and interest in the stratum as a separate subject of study. All this is subject to constraints based on the estimated pro-

cessing costs or the target size of the total sample for the program.

For most SOI studies, returns are designated by computer from the IRS Master Files based on the taxpayer identification number (TIN), which is either the Social Security number (SSN) or the Employer Identification Number (EIN). A fixed and essentially random number is associated with each possible TIN. If that random number falls into a range of numbers specified for a return's sample stratum, then it is selected and processed for the study. Otherwise, it is counted (for estimation purposes), but not selected. In some cases, the TIN is used directly by matching specified digits of it against a predetermined list for the sample stratum. A match is required for designation.

Under either method of selection, the TINs designated from one year's sample are, for the most part, selected for the next year's, so that a very high proportion of the returns selected in the current year's sample are from taxpayers whose previous years' returns were included in earlier samples. This longitudinal character of the sample design improves the estimates of change from one year to the next.

Method of Estimation

As noted above, the probability with which a return is selected for inclusion in a sample depends on the sampling rate prescribed for the stratum in which it is classified. "Weights" are computed by dividing the count of returns filed for a given stratum by the number of population sample returns for that same stratum. These weights are usually adjusted for unavailable returns, outliers, or trimming weights. Weights are used to adjust for the various sampling rates used, relative to the population—the lower the rate, the larger the weight. For some studies, it is possible to improve the estimates by subdividing the original sampling classes into "poststrata," based on additional criteria or refinements of those used in the original stratification. Weights are then computed for these poststrata using additional population counts. The data on each sample return in a stratum are then multiplied by that weight. To produce

Sample returns are designated by computer from the IRS Master Files based on the taxpayer identification number.

SOI Sampling Methodology and Data Limitations

In transcribing and tabulating data from tax returns, checks are imposed to improve the quality of the statistics.

the tabulated estimates, the weighted data are summed to produce the published statistical totals.

Sampling Variability

The particular sample used in a study is only one of a large number of possible random samples that could have been selected using the same sample

design. Estimates derived from the different samples usually vary. The standard error of the estimate is a measure of the variation among the estimates from all possible samples and is used to measure the precision with which an estimate from a particular sample approximates the average result of the possible samples. The sample estimate and an estimate of its standard error permit the construction of interval estimates with prescribed confidence that this interval includes the actual population value.

In SOI reports, the standard error is not directly presented. Instead, the ratio of the standard error to the estimate itself is presented in percentage form. This ratio is called the coefficient of variation (CV). The user of SOI data may multiply an estimate by its CV to recreate the standard error and to construct confidence intervals.

For example, if a sample estimate of 150,000 returns is known to have a coefficient of variation of 2 percent, then the following arithmetic procedure would be followed to construct a 68-percent confidence interval estimate:

$$\begin{array}{ll} 150,000 & \text{(sample estimate)} \\ \times 0.02 & \text{(coefficient of variation)} \\ = 3,000 & \text{(standard error of estimate)} \end{array}$$

then:

$$\begin{array}{ll} 150,000 & \text{(sample estimate)} \\ + \text{ or } - 3,000 & \text{(standard error)} \\ = \{147,000, 153,000\} & \text{(68-percent confidence interval).} \end{array}$$

Based on these data, the interval estimate is from 147 to 153 thousand returns. This means that the average estimate of the number of returns lies within an interval computed in this way. Such an estimate would be correct for approximately two-thirds of all possible

samples similarly selected. To obtain this interval estimate with 95-percent confidence, the standard error should be multiplied by 2 before adding to and subtracting from the sample estimate. (In this particular case, the resulting interval would be from 144 to 156 thousand returns.)

Further details concerning sample design, sample selection, estimation method, and sampling variability for a particular SOI study may be obtained, on request, by writing to the Director, Statistics of Income Division, at the address given above.

Nonsampling Error Controls and Limitations

Although the previous discussion focuses on sampling methods and the limitations of the data caused by sampling error, there are other sources of error that may be significant in evaluating the usefulness of SOI data. These include taxpayer reporting errors and inconsistencies, processing errors, and the effects of any early cutoff of sampling. Additional information on nonsampling error as it applies to individual and corporation income tax returns is presented in the separate SOI reports on these returns.

In transcribing and tabulating the information from returns or forms selected for the sample, steps are taken to improve the quality of the resultant estimates. Tax return data may be disaggregated or recombined during the statistical abstracting and "editing" process that takes place in IRS submission processing centers. This is done to improve data consistency from return to return and to achieve definitions of the data items more in keeping with the needs of major users. In some cases, not all of the data are available from the tax return as originally filed. Sometimes, the missing data can be obtained by the Statistics of Income Division in Washington, DC, through field followup. More often, though, they are obtained through manual or computerized imputation. For this purpose, other information in the return or in accompanying schedules may be sufficient to serve as the basis for making an estimate. Prior-year data for the same taxpayer can be used for this same purpose, or comparable data from business reference books may be substituted.

Data abstracted or "edited" from returns for statistical use are subjected to a number of validation checks, including systematic verifications of a sampling of the work of each tax examiner involved in the SOI process. Data reported on sampled returns

SOI Sampling Methodology and Data Limitations

and previously transcribed as part of processing for the IRS Master Files are subject to validation as part of the administrative process before SOI processing begins. However, during the administrative process, it is only practical to transcribe corrections to errors that have a direct bearing on the tax reported or the refund claimed. Therefore, during the SOI process, checks must also be made to correct any errors or inconsistencies left in the administrative data before the data can be accepted for the statistics.

The Statistics of Income program includes many more tax return items than are transcribed and perfected for IRS tax administration needs, especially for items reported in tax return schedules in support of the various summary totals reported on the return. Therefore, checks must also be designed to validate these additional data items and to assure that they are consistent with other data entries.

Most of the data validation checks made during the SOI process take the form of computerized tests of each record. In addition to verifying that internal consistency and proper balance and relationships among the tax return items and statistical classifications are maintained, this process is intended to check on consistency with tax law provisions, acceptable reporting practices, and generally accepted accounting principles. Most testing occurs during the data abstracting and editing operation, while the tax return source document is still on hand, although some testing for certain programs occurs later on. Records failing the tests are subjected to further review and correction.

Finally, before publication, the statistics are reviewed for accuracy and reasonableness in light of the tax law provisions, taxpayer reporting variations and other limitations, tolerances and statistical techniques allowed or employed in data processing and estimating, economic conditions, and comparability with other statistical series. However, these controls do not completely eliminate the possibility of error. When discovered, errors in *Bulletin* tables are corrected, through a published errata.

Table Conventions

Published estimates subject to excessive sampling variability are identified for most of the statistics by means of an asterisk (*) presented alongside the estimate or in place of an estimate. Presence of an asterisk means that the sampling rate was less than 100 percent of the population and that there were fewer than 10 sample observations available for estimation purposes. This method produces a rough indication of excessive sampling variability. However, the results will differ somewhat from more precise indicators of excessive sampling variability based on the standard statistical formula. For some of the statistics based on samples, asterisking was not possible because of resource and other constraints. Users should keep this limitation in mind when using these data.

A zero, in place of a frequency or an amount, in any given table cell presenting data based on an SOI sample, indicates either that (1) there were no returns in the population with the particular characteristic, or (2) because of its rarity, instances of the characteristic were not present among the sampled returns. However, for statistics based on returns selected for the sample at the 100-percent rate, a zero indicates a presumption of no returns with the particular characteristic in the population.

In addition to sampling variability, Statistics of Income is required to prevent disclosure of information about specific taxpayers or businesses in its tables. Therefore, a weighted frequency (and the associated amount, where applicable) of less than 3 is either combined with data in an adjacent cell(s) so as to meet the criteria, or deleted altogether. Similar steps are taken to prevent indirect disclosure through subtraction. However, any combined or deleted data are included in the appropriate totals. Most data on tax-exempt, nonprofit organizations are excluded from disclosure review because the Internal Revenue Code and regulations permit public access to most of the information reported by these organizations.

Public Release of SOI Information

Goals for Public Release of SOI Information

Statistics of Income program and year	End of tax year	Close of filing period—		Close of sampling period	Tentative release date for final data
		Regular	With extensions of time		
	(1)	(2)	(3)	(4)	(5)
Individual income tax returns:					
2006	December 2006	April 2007	October 2007	December 2007	August 2008
2007	December 2007	April 2008	October 2008	December 2008	August 2009
Nonfarm sole proprietorships:					
2006	December 2006	April 2007	October 2007	December 2007	August 2008
2007	December 2007	April 2008	October 2008	December 2008	August 2009
Partnerships:					
2006	December 2006	April 2007	October 2007	December 2007	July 2008
2007	December 2007	April 2008	October 2008	December 2008	July 2009
Corporations: [1]					
2005	June 2006	September 2006	March 2007	June 2007	March 2008
2006	June 2007	September 2007	March 2008	June 2008	March 2009
Corporation foreign tax credit: [2]					
2005	June 2006	September 2006	March 2007	June 2007	October 2008
2006	June 2007	September 2007	March 2008	June 2008	October 2009
Controlled foreign corporations: [2]					
2006	June 2007	September 2007	March 2008	June 2008	October 2009
Tax-exempt organizations: [3]					
2005	November 2006	April 2007	October 2007	December 2007	August 2008
2006	November 2007	April 2008	October 2008	December 2008	August 2009
Private foundations: [3]					
2005	November 2006	April 2007	October 2007	December 2007	August 2008
2006	November 2007	April 2008	October 2008	December 2008	August 2009
Tax-exempt organization unrelated business income: [3]					
2005	November 2006	April 2007	October 2007	December 2007	October 2008
2006	November 2007	April 2008	October 2008	December 2008	October 2009
Estate tax returns:					
2007	[4]	[4]	[4]	December 2007	October 2008
2008	[4]	[4]	[4]	December 2008	October 2009
Split-interest trusts:					
2007	[5]	[5]	[5]	December 2007	October 2008
2008	[5]	[5]	[5]	December 2008	October 2009
Gift tax returns:					
2007	[4]	[4]	[4]	December 2007	October 2008
2008	[4]	[4]	[4]	December 2008	October 2009
Nonresident alien estate tax returns:					
2007	[4]	[4]	[4]	December 2007	February 2009
2008	[4]	[4]	[4]	December 2008	May 2009
Fiduciary extracts:					
2007	[5]	[5]	[5]	December 2007	October 2008
2008	[5]	[5]	[5]	December 2008	October 2009
Tax-exempt bonds:					
2006	[6]	[6]	[6]	December 2007	April 2008
2007	[6]	[6]	[6]	December 2008	April 2009

[1] Corporation statistics for 2005 represent accounting periods ended July 2005 through June 2006. Study Year 2006 is similarly defined.

[2] Data for 2005 represent accounting periods ending July 2005 through June 2006. Data for Study Year 2006 are similarly defined.

[3] Data for 2005 represent tax years ending between December 2005 and November 2006. Study Year 2006 is similarly defined.

[4] Estate and gift tax data are processed on a filing-year, rather than on a year-of-death or gift-year (tax-year) basis. At a later stage (not shown here), filing years are combined by year of death or gift year, respectively.

[5] Split-interest trust and fiduciary income tax statistics are processed on a filing-year rather than a tax-year basis.

[6] Tax-exempt private activity governmental bond statistics are collected annually based on issue year. Arbitrage rebate and penalty studies are conducted biennially, for tax years ending in odd numbers.

SOI Projects and Contacts

General Statistical Information: (202) 874-0410 Fax: (202) 874-0964 e-mail: sis@irs.gov

Projects*	Primary Analysts	Frequency and Program Content
Americans Living Abroad: 2006 Program	Scott Hollenbeck Maureen Keenan Kahr	This periodic study is conducted every 5 years. It covers foreign income, foreign taxes paid, and foreign tax credit shown on individual income tax returns. Data are classified by size of adjusted gross income and country.
Controlled Foreign Corporations: 2006 Program	Jason Wenrich	This semiannual study provides data on activities of foreign corporations that are controlled by U.S. corporations. Data are classified by industry group and country.
Controlled Foreign Partnerships: 2008 Program	Bill States	This study provides data on activities of foreign partnerships that are controlled by U.S. corporations or partnerships. Frequency of this study has not been determined.
Corporation Foreign Tax Credit: 2005 Program 2006 Program	Rob Singmaster Scott Luttrell	This annual study provides data on foreign income, taxes paid, and foreign tax credit reported on corporation foreign income tax returns. Data are classified by industry group and country.
Corporation Income Tax Returns: 2005 Program 2006 Program	Bill Rush Todd Reum Ellen Legel	Basic data are produced annually and cover complete income statement, balance sheet, tax, tax credits, and details from supporting schedules. Data are classified chiefly by industry group or asset size.
Entity Classification Election:	John Comisky Lawrence Sao	This annual study provides data from all Entity Classification Elections, including the type of election and whether the entity is foreign or domestic.
Estate Tax: 2004-2006 Program 2007-2009 Program	Brian Raub	This annual study provides information on a gross estate and its composition, deductions, and tax; and information on the age, sex, and marital status of decedents. Basic estate tax return data by year in which returns are filed are produced each year. Also included are data on nonresident aliens who had more than \$60,000 of assets in the United States. Other statistics are available on a year-of-death basis (approximately every 3 years). The most recent study is based on decedents who died in 2004 with returns filed in 2004-2006. The most recent data available are for returns filed in 2006.

SOI Projects and Contacts

General Statistical Information: (202) 874-0410 Fax: (202) 874-0964 e-mail: sis@irs.gov

Excise Taxes:	Melissa Laine	Basic data are collected and processed by three Department of the Treasury agencies: the Internal Revenue Service, the Alcohol and Tobacco Tax and Trade Bureau (formerly the Bureau of Alcohol, Tobacco, Firearms, and Explosives), and the Customs Service. Data by type of tax are shown by Fiscal Year (FY) for 1998-2004 and quarterly for FY 2005 and the first two quarters of FY 2006.
Farm Sole Proprietorships:		
2005 Program	Kevin Pierce	This periodic study provides farm income and expenses classified by industry and gross farm income reported by individuals on Schedule F, <i>Profit or Loss from Farming</i> .
2006 Program	Mary Jezek	
Foreign-Controlled Domestic Corporations:		
2005 Program	James Hobbs	This annual study covers domestic corporations with 50-percent-or-more stock ownership by a single foreign "person." It covers balance sheet, income statement, and tax-related data, which are classified by industry group, country, and size and age of the corporations. Data are compared to those for other domestic corporations.
Foreign Recipients of U.S. Income:		
2006 Program	Scott Luttrell	This annual study provides data by country on income paid to nonresident aliens and the amount of tax withheld for the U.S. Government.
Foreign Trusts:		
2006 Program	Dan Holik	This periodic study, conducted every 4 years, provides data on foreign trusts that have U.S. "persons" as grantors, transferors, or beneficiaries. Data include country where the trust was created, value of transfer to the trust, and year the trust was created. The most recent study is for Tax Year 2002.
Gift Tax:		
2006 Program	Darien Jacobson	This annual study provides data for type and amount of gift, information on donee, and tax computation items. Information about the donor and gift splitting is also available. Most recent data are for Filing Year 2006.
2007 Program		
2008 Program		
Individual Income Tax Return Public-Use File:	Mario Fernandez	Microdata on CD-ROMs are produced annually and contain detailed information obtained from the individual income tax return statistics program, with identifiable taxpayer information omitted to make the file available for public dissemination on a reimbursable basis.
Individual Income Tax Returns:		
2004 Program	Maureen Keenan Kahr	Basic data are produced annually and cover income, deductions, tax, and credits reported on individual income tax returns and associated schedules. Data are classified by size of adjusted gross income, marital status, or type of tax computation.
2005 Program	Scott Hollenbeck	
2006 Program	Jeff Curry	

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Individual Income Tax Returns Special Tabulations:	Mike Parisi	Special tabulations of selected individual income, deduction, and tax data are produced on a reimbursable basis.
Interest-Charge Domestic International Sales Corporations (IC-DISCs): 2005 Program 2006 Program	Dan Holik	These corporations replaced the Domestic International Sales Corporations, or DISCs, as of 1985. Balance sheet, income statement, and export-related data are tabulated every 4 years. The most recent study is for Tax Year 2004.
International Boycott Reports: 2005 Program 2006 Program	Lissa Costa	This study provides data on business operations of U.S. "persons" in boycotting countries, as well as the requests and agreements to participate in, or cooperate with, international boycotts not sanctioned by the U.S. Government.
Migration Flow and County Income Data:	Emily Gross Kevin Pierce	Migration flow data (based on year-to-year changes in individual income tax return addresses) and county or State income data are available annually on a reimbursable basis. The most recent data are for 2004-2005.
Noncash Charitable Contributions:	Janette Wilson	This study of individual income tax returns provides detailed asset donations, descriptions of the donees, donor cost, fair market value, and deduction claimed on Form 8283, <i>Noncash Charitable Contributions</i> .
Occupation Studies:	Terry Nuriddin	This periodic study classifies individual income tax returns by occupation and contains a dictionary of occupational titles that can be used to enhance the economic data of other individual income tax return studies.
Partnership Returns of Income:	Tim Wheeler Nina Shumofsky	Basic data, produced annually, cover income statement, balance sheet, and details from supporting schedules. Data are classified chiefly by industry group.
Partnership Withholding Study: 2005 Program	Scott Luttrell	This annual study provides data on U.S. partnership payments to foreign partners. Data are classified by country and recipient type.
Personal Wealth Study: 2005 Program 2006 Program	Brian Raub	This periodic study provides estimates of personal wealth of top wealth holders that are generated from estate tax return data using the "estate multiplier" technique, in conjunction with both filing-year and year-of-death estate databases. The most recent data, 2004, are based on returns filed from 2004 to 2006.

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S Corporations:	Heather Parisi	Annual study data are collected for the income statement and balance sheet, and from supporting schedules. Data are classified by industry group or asset size.
Sales of Capital Assets:	Janette Wilson	This periodic study provides detailed data on the sales of capital assets reported in the capital gains schedule of the individual income tax return, and on sales of residences and personal or depreciable business property.
Sole Proprietorships: 2004 Program 2005 Program 2006 Program	Jeff Curry	Basic data, produced annually, cover business receipts, deductions, and net income reported on Schedule C, <i>Profit or Loss From Business</i> , for nonfarm proprietors, classified by industry group.
Split-Interest Trust Information: 2006 Program 2007 Program 2008 Program	Lisa Schreiber	This annual study provides information on charitable remainder trusts, charitable lead trusts, and pooled income funds. Data include balance sheet, income, deductions, and detail from accumulation and distribution schedules. The most recent data are for Filing Year 2006.
Tax-Exempt Bond Issues: 2006 Program 2007 Program 2008 Program	Cynthia Belmonte Emily Shammass	This annual study provides information on private activity and Governmental bond issues by type of property financed, size of face amount, and State. The most recent data are for Tax Year 2006 public purpose bonds and private activity bonds.
Tax-Exempt Organizations (Except Private Foundations): 2005 Program 2006 Program 2007 Program	Paul Arnsberger	This annual study provides balance sheet and income statement data for organizations classified as tax-exempt under subsections 501(c)(3)-(9) of the Internal Revenue Code. The most recent data are for Reporting Year 2005 returns filed in Calendar Years 2006-2007.
Tax-Exempt Organizations (Private Foundations): 2005 Program 2006 Program 2007 Program	Melissa Ludlum Cynthia Belmonte	This annual study provides balance sheet and income statement data for domestic private foundations and charitable trusts filing a Form 990-PF. The most recent data are for Reporting Year 2005 returns filed in Calendar Years 2006-2007.
Tax-Exempt Organizations, Unrelated Business Income: 2004 Program 2005 Program 2006 Program	Melissa Ludlum	This annual study provides tabulations of "unrelated business" income and deductions for organizations classified as tax-exempt under the Internal Revenue Code. The most recent data are for Reporting Year 2004 returns filed in Calendar Years 2006-2007.

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**Transactions of Foreign-
Controlled Corporations:**

Mark Lowe

This biennial study provides data on transactions between U.S. corporations and their foreign owners. Data are classified by country and industry group.

U.S. Possessions Corporations:

2005 Program

Dan Holik

This periodic study, planned for every 2 years, provides data on income statements, balance sheets, tax, and "possessions tax credit" for qualifying U. S. possessions corporations. (Most of these corporations are located in Puerto Rico.)

ZIP Code Area Data:

Mary Jezek

Statistics on CD-ROM show number of individual income tax returns, exemptions, and several income items by State and 5-digit ZIP Code. Data are available for 2002, 2004, and 2005 on a reimbursable basis. (Data for Tax Years 1991, 1998, and 2001 are also available, free of charge, on the IRS Web site: <http://www.irs.gov/taxstats/article/0,,id=96947,00.html>.)

* Many of the data release dates, i.e., the months in which the Statistics of Income Division expects to release data to users, ahead of publication, on request, are published in each issue of the *SOI Bulletin* (see "Public Release of SOI Information"). For more information about data availability for a particular project, call or fax the numbers shown at the top of the page.

SOI Products and Services

Statistics of Income (SOI) data are available in electronic formats and in printed publications. For further information on any of the following products and services, or for answers to questions on the availability of SOI data, other statistical services, or release dates for data, contact SOI's **Statistical Information Services (SIS)**:

Statistical Information Services (sis@irs.gov)
Statistics of Income Division
Internal Revenue Service
P.O. Box 2608 • Washington, DC 20013-2608
(202) 874-0410 • **Fax:** (202) 874-0964

As its name implies, SIS is best able to answer questions about data. It does not supply tax forms or information about the status of an individual's tax refund or audit examination. Media requests should be directed to the IRS Media Relations Branch, Communications Division, on (202) 622-4000.

Electronic Products and Services

Products Available Free on the Internet

SOI's Internet site offers a combination of files presenting SOI tables, articles about SOI data, and information about SOI products and services, as well as non-SOI products, including annual *IRS Data Book* tables, Compliance Research projections, and nonprofit Master File microdata records. At present, over 8,225 files reside there.

Web site: www.irs.gov/taxstats

There is also a direct link to our Web site from FedStats, the gateway to official statistics from the Federal Government: www.fedstats.gov.

Tax Stats

On the Tax Stats Home Page, you will find the following list of topics that will lead you to a wide range of tables, articles, and data that describe and measure elements of the U.S. tax system. There is also a link to check out What's New.

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Products Available From SOI

Many of SOI's data files are available for sale on CD-ROM, diskette, tape, or via e-mail through the Statistical Information Services Office. **Prepayment is required for orders of \$100 or more**, with checks made payable to the **IRS Accounting Section**. Contact SIS for information on specific products, prices, sources, media, and ordering instructions.

The following files are currently available on a reimbursable basis and include data from returns covering corporations, individuals, exempt organizations, and private foundations and charitable trusts. Most of these files are tabulations of aggregated data, but some are files of microdata records.

Corporation Income Tax Returns

Corporation Source Book

A magnetic tape or CD-ROM containing data from the *Corporation Source Book* are available for years 1996-2003 at a cost of \$250 per year. Data from the 2004 and 2005 *Corporation Source Books* are available at no charge from the Tax Stats Web site. Data tables from the 2000 through 2005 *Source Book* are also available at no charge from the Tax Stats Web site at: www.irs.gov/taxstats/bustaxstats/article/0,,id=149687,00.html. See also *Printed Publications* section.

Individual Income Tax Returns

Individual Public-Use Microdata Files

These files include individual income tax returns for 1960, 1962, 1964, and 1966-2004. All of the files have been edited to protect the confidentiality of individual taxpayers. Public-use files of individual income tax returns for 1960, 1962, 1964, and 1966-1991 are available for sale by writing to the Center for Electronic Records at the National Archives and Records Administration, 8601 Adelphi Road, College Park, MD 20740-6001, or by calling toll-free (866) 272-6272. Files for 1992 through 2004 are available on CD-ROM from the SOI Division. Price for the SOI microdata file is \$4,000 per year.

County-to-County Migration Data

One table, based on the year-to-year changes in the addresses shown on the population of returns from the IRS Individual Master File system. This table presents data on migration patterns by county for the entire United States, including inflows and outflows. The data include the number of returns (which approximates the number of households); the number of personal exemptions (which approximates the population); total “adjusted gross income” (starting with Filing Year 1993). Available for Filing Years 1984-2007. Price is \$200 per year for the entire United States or \$10 per State per year. (All years for the entire United States are also available for \$500.)

State-to-State Migration Data

One table, based on the year-to-year changes in the addresses shown on the population of returns from the IRS Individual Master File system. This table presents data on migration patterns by State for the entire United States, including inflows and outflows. The data include the number of returns (which approximates the number of households); the number of personal exemptions (which

approximates the population); total “adjusted gross income” (starting with Filing Year 1993). Available for Filing Years 1989-2007. Price is \$50 per year for the entire United States or \$10 per State per year.

County Income Data

One table, based on the population of returns from the IRS Individual Master File system. This table presents data for adjusted gross income (total and for selected sources), number of returns (which approximates the number of households), and number of personal exemptions (which approximates the population). The data are presented by county (including State totals) and are available for Tax Years 1989-2006 for the entire United States. Price is \$50 per year for the entire United States or \$10 per State per year.

ZIP Code Area Data

Statistics are available for Tax Years 2002, 2004, and 2005 on CD-ROM showing the number of individual income tax returns; the total number of exemptions and number of dependent exemptions (which approximates population); adjusted gross income; salaries and wages; taxable interest; total tax; contributions; number of returns with Schedules C and F; and number of returns with Schedule A, by State and 5-digit ZIP Code. In addition to these items, data for Tax Year 2004 and 2005 also show the amount of taxable dividends; net capital gain/loss; IRA payment adjustment; self-employed pension adjustment; taxes paid deduction; alternative minimum tax; income tax before credits; earned income credit; and number of returns prepared by paid preparers. Price is \$500 for the entire United States; \$25 for a single State. Data for Tax Years 1998 and 2001 are available free on SOI’s Internet site. Go to www.irs.gov and select the **Tax Stats** option; Individual Tax Statistics; Individual Income Tax; Zip Code Data (SOI) under Data by Geographic Areas.

Tax-Exempt Organizations

Compendium of Studies of Tax-Exempt Organizations, 1989-1998

This is a compilation of articles on SOI studies of charitable and other nonprofit organizations described in Internal Revenue Code sections 501(c)(3)-(c)(9), private foundations, charitable remainder trusts, and nonprofit organizations’ unrelated business income. All of these articles were published previously in various issues of the *Statistics of Income Bulletin*. In addition, the *Compendium* includes papers on statistical sampling of tax-exempt

SOI Products and Services

organization returns, and other topics relating to tax-exempt organizations and philanthropy that were authored by IRS staff and others who use SOI study data for research. Available at no charge on CD-ROM.

Microdata Records for Tax Year 2005

Microdata records of all Forms 990 and 990-EZ sampled for the annual SOI study of tax-exempt organizations. The samples include 15,862 Internal Revenue Code section 501(c)(3) organizations and 6,577 section 501(c)(4)-(9) organizations. All returns for organizations with assets of \$50 million or more are included in the sample. Microdata records contain information on balance sheets and income statements, as well as weights (to estimate the population), for each organization. Available for download from SOI's Tax Stats Web site at www.irs.gov/taxstats/charitablestats/article/0,,id=97176,00.html, or may be purchased.

Microdata Records for Tax Years 1992-2004

Microdata records of all Forms 990 and 990-EZ sampled for the annual SOI study of tax-exempt organizations. Microdata records contain information on balance sheets and income statements, as well as weights (to estimate the population), for each organization. Available for download from SOI's Tax Stats Web site at www.irs.gov/taxstats/charitablestats/article/0,,id=97176,00.html, or may be purchased on CD-ROM for \$20.

Private Foundations (and Charitable Trusts)

Microdata Records for Tax Year 2005

Microdata records of all Forms 990-PF sampled for the annual SOI study covering private foundations and Internal Revenue Code section 4947 (a)(1) charitable trusts. The file contains both operating and nonoperating foundations and trusts. The sample includes 11,767 returns. (All returns filed by foundations with assets of \$10 million or more, as well as the population of returns filed by nonexempt charitable trusts, are included in the sample.) Microdata records contain information on revenue, expenses, assets, and distributions, as well as weights, for each foundation or trust. Available for download from SOI's Tax Stats Web site at www.irs.gov/taxstats/charitablestats/article/0,,id=96996,00.html, or may be purchased for \$20.

Microdata Records for Tax Years 1992-2004

Microdata records of all Forms 990-PF sampled for the annual SOI study covering private foundations and Internal Revenue Code section 4947 (a)(1) charitable trusts. Microdata records contain information on revenue, ex-

penses, assets, and distributions, as well as weights, for each foundation or trust. Available for download from SOI's Tax Stats Web site at www.irs.gov/taxstats/charitablestats/article/0,,id=96996,00.html, or may be purchased for \$20.

Printed Publications

Publications Available for Sale From GPO

Recent SOI publications are available from the Superintendent of Documents, U.S. Government Printing Office, Washington, DC, **by calling (202) 512-1800, or faxing (202) 512-2250.** (Credit cards are accepted.) Publications may also be obtained by using the order form at the end of this *Bulletin* or write to:

Superintendent of Documents

P.O. Box 371954
Pittsburgh, PA 15250-7954

Note:

If you determine from the Government Printing Office that any of the following items are out of print or unavailable, call **Statistical Information Services on (202) 874-0410** for assistance. The most recent issue of these publications may be available from SOI.

IRS Data Book, 2007

Annually, Publication 55B, Stock No. 048-004-02498-5
Price: \$11 Foreign: \$15.40

This volume pertains to Fiscal Year 2007—October 1, 2006, through September 30, 2007. The report provides information on returns filed and taxes collected, enforcement, taxpayer assistance, the IRS budget and workforce, and other selected activities.

Statistics of Income Bulletin

Quarterly, Publication 1136, Stock No. 748-005-00000-5
Subscription price: \$53 Single copy price: \$39

This series provides the earliest published financial statistics from individual and corporation income tax returns. The *Bulletin* also includes annual data on nonfarm sole proprietorships and partnerships, as well as periodic or special studies of particular interest to tax analysts, administrators, and economists. Historical tables include data from SOI, as well as tax collections and refunds by type of tax.

Statistics of Income—2004, Corporation Income Tax Returns

Publication 16, Stock No. 048-004-02495-1
Price: \$50 Foreign: \$70

This report presents more comprehensive data on corporation income tax returns with accounting periods that ended July 2004 through June 2005 than those published earlier in the *SOI Bulletin*.

Presents information on:

- receipts
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- net income
- taxable income
- income tax
- tax credits
- assets
- liabilities

Classifies data by:

- industry
- accounting period
- size of total assets
- size of business receipts
- size of income tax after credits

Statistics of Income—2005, Individual Income Tax Returns

Publication 1304, Stock No. 048-004-02497-7
Price: \$37 Foreign: \$51.80

This report presents more comprehensive and complete data on individual income tax returns for Tax Year 2005 than those published earlier in the *SOI Bulletin*.

Presents information on:

- sources of income
- exemptions
- itemized deductions
- tax computations

Classifies data by:

- size of adjusted gross income
- marital status
- type of tax computation

Publications Available From SOI

Other SOI periodicals and one-time reports are available for sale from Statistical Information Services. These reports include data from returns covering corporations and estate taxes.

Statistics of Income—2005, Corporation Source Book

Publication 1053 Price: \$175 plus \$10 for shipping and handling

This document presents detailed income statement, balance sheet, tax, and selected items, by sector, major and minor industrial groups, and size of total assets for all

returns and separately for returns with net income. Separate statistics on S corporations are included by sector. Industry detail is based on the North American Industry Classification System (NAICS). The report, which underlies the *Statistics of Income—Corporation Income Tax Returns* publication, is part of an annual series and can be purchased in its entirety or by page. *Corporation Source Book* industry pages and notes for 1963 through the present are available at a cost of \$30, plus \$1 per page copying charge (free for orders under 5 pages). The complete, printed version of the *Source Book* for 1984-2004, is also for sale at \$175 per year, plus \$10 for shipping and handling. See also *Electronic Products and Services* section.

Compendium of Federal Estate Tax and Personal Wealth Studies

Publication 1773 Price: \$26 plus \$10 for shipping and handling

Part I of this report focuses on data from estate tax returns, describing decedents, their beneficiaries, and the composition of their estates. It contains a methodological discussion of the strategy used in weighting sample data for the estate studies and presents statistics on selected components of decedents' estates, 1916-1990. Information on charitable giving is also included.

Part II presents a series of articles describing the estate-multiplier technique and its applications for personal wealth estimates, estimates of personal wealth for selected years 1962-1989, and a discussion of the relationship among realized income, wealth, and well-being.

Special Studies in Federal Tax Statistics, 2006

Publication 1299 No charge

This is the sixth edition of the IRS Methodology Report series *Special Studies in Federal Tax Statistics, 2006*. The papers included in this volume were presented in 2006 at the Joint Statistical Meetings of the American Statistical Association (ASA) held in Seattle, Washington, the National Tax Association's Annual Conference on Taxation held in Boston, Massachusetts, and the United Nations Statistical Commission and Economic Commission for Europe Conference of European Statisticians held in Geneva, Switzerland.

It has been divided into six major sections:

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■ Innovative uses of longitudinal panels, information documents, and time-series analysis to study the impact of the U.S. tax system; ■ Measuring, monitoring, and evaluating Internal Revenue Service data;	■ Broad quality issues in organizations; ■ Survey-based estimation; ■ Tax benefits and administrative burdens, recent research from the IRS; and ■ Statistical dissemination and communication.



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