Controlled Foreign Corporations, 1990

Data Release

For 1990, the 7,500 largest (in total assets) foreign corporations controlled by large (more than $500 million in total assets) U.S. multinational corporations held nearly $1.3 trillion in assets and reported receipts of over $1.1 trillion. These amounts reflect increases from 1988 (the last year for which statistics are available) of over 30 percent in reported assets and receipts [1].

More than two-thirds of the largest 7,500 Controlled Foreign Corporations (CFC's) were in two industrial divisions, manufacturing, and finance, insurance, and real estate for 1990 (Table 1). However, over the last several years the number of top 7,500 CFC's in the manufacturing division has steadily declined, falling from 3,341 for 1986 to 2,962 for 1990, a decrease of over 11 percent. In spite of the decline, these 2,962 CFC's, nearly 40 percent of the largest 7,500, accounted for over half of the total $88.7 billion of "current earnings and profits" (less deficit) before taxes reported by the largest CFC's for 1990. In contrast, the number of CFC's in finance, insurance, and real estate steadily increased over this same period, climbing from 1,911 for 1986 to 2,234 for 1990, an increase of nearly 17 percent. These 2,234 CFC's, nearly 30 percent of the largest 7,500, accounted for approximately 16 percent of the current earnings and profits before taxes. The number of CFC's in wholesale and retail trade and their percentage share of current earnings and profits before taxes remained fairly consistent across this same period. For 1990, approximately 15 percent of the largest 7,500 CFC's were wholesalers and retailers and these corporations accounted for slightly more than 16 percent of the current earnings and profits before taxes. The number of CFC's in the services division also increased during this period, growing from 519 for 1986 to 655 for 1990. This division accounted for 9 percent of the largest 7,500 CFC's and 3 percent of the current earnings and profits before taxes for 1990.

Over half of the receipts and current earnings and profits before taxes reported by CFC's within the manufacturing division were accounted for by three major industrial groups: motor vehicles and equipment, chemicals and allied products, and non-electrical machinery. However, the proportion of receipts and profits accounted for by each of these groups varied. Those in the motor vehicles and equipment group accounted for 20 percent of the total receipts of $629.4 billion and 8 percent of the current earnings and profits before taxes of $46.9 billion reported by all CFC's that were manufacturers, while those classified in chemicals and allied products accounted for 16 percent of the total receipts and 21 percent of the current earnings and profits before taxes. CFC's classified under non-electrical machinery reported 15 percent and 22 percent of the total receipts and current earnings and profits before taxes, respectively.

Sixty-six percent of the largest 7,500 CFC's were incorporated in Europe or Canada (Table 2). These CFC's accounted for 73 percent of the total assets, 75 percent of the total receipts, and 68 percent of current earnings and profits before taxes reported for the largest 7,500 CFC's. Collectively, 2,622 (35 percent) of the largest 7,500 CFC's were incorporated in just three countries: the United Kingdom, Canada, and West Germany. These corporations accounted for 47 percent of the total assets, 45 percent of the total receipts, and 35 percent of current earnings and profits before taxes.

The United Kingdom was the country of incorporation for 1,257, approximately 17 percent, of the 7,500 largest CFC's (Table 3). These CFC's were heavily concentrated in finance, insurance, and real estate; nearly 44 percent of the CFC's incorporated in the United Kingdom were classified in this industrial division. However, they accounted for only 15 percent of the $189.8 billion in total receipts and 12 percent of the $11.8 billion in current earnings and profits before taxes reported for all CFC's incorporated in the United Kingdom. In contrast, CFC's in the manufacturing division accounted for more than half of the total receipts and nearly half of the current earnings and profits before taxes, even though they represented only 31 percent of the CFC's incorporated in the United Kingdom.

CFC's incorporated in Canada and West Germany accounted for 11 percent and 7 percent of the largest 7,500 CFC's, respectively. In both countries, nearly half of the CFC's were in the manufacturing industrial division (374 of 819 CFC's in Canada and 264 of 546 CFC's in West Germany). In Canada, these manufacturing CFC's accounted for 63 percent of the $174.3 billion in total receipts and 53 percent of the $10.5 billion in current earnings and profits before taxes reported for all CFC's in that country. Even higher percentages of receipts and profits were attributable to manufacturing CFC's in West Germany. There, CFC's in manufacturing accounted for 71 percent of the $134.4 billion in total receipts and 70 percent of the $6.4 billion in current earnings and profits before taxes reported for all West German CFC's.

Data Sources and Limitations

The statistics are based on data collected from corporation income tax returns in the Form 1120 series and attached Form(s) 5471, *Information Return of U.S. Persons with Respect to Certain Foreign Corporations* for U.S.

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corporations with accounting periods ending July 1990 through June 1991. These statistics report data for the largest (in terms of total assets) 7,500 foreign corporations controlled by U.S. corporations with total assets of $500 million or more. Because the Internal Revenue Service regulations require a U.S. corporation to submit a Form 5471 for any CFC with an accounting period ending with or within the U.S. parent's accounting period, the CFC's accounting period may have ended as early as August 1989 or as late as June 1991. However, most CFC activity did occur in Calendar Year 1990. The 7,500 largest CFC's accounted for approximately 94 percent of the total assets, 90 percent of the total receipts, and 92 percent of the current earnings and profits before taxes reported by all active CFC's of these U.S. corporations. The amount of total assets for these 7,500 largest CFC's ranged from approximately $17 million to nearly $20 billion [2].

Several limitations must be kept in mind when making comparisons to prior-year statistics. First, changes in the composition of the largest 7,500 CFC's may have occurred. For example, it is very possible that certain foreign corporations that were among the largest 7,500 CFC's for 1988 may still exist, but not be among the largest 7,500 CFC's for 1990. Second, large CFC's tend to be engaged primarily in manufacturing or finance, insurance, and real estate. For 1990, approximately 30 percent and 21 percent of all active CFC's of U.S. corporations with $500 million or more in assets were classified in manufacturing and in finance, insurance, and real estate, respectively. However, among the largest 7,500 CFC's, 40 percent were primarily engaged in manufacturing and 30 percent were classified in finance, insurance, and real estate. In contrast, the service and wholesale and retail trade divisions tend to be underrepresented in the largest 7,500 CFC's. Services and wholesale and retail trade accounted for 17 percent and 20 percent respectively, of all active CFC's controlled by U.S. parents with $500 million or more in assets, but only 9 percent and 16 percent of the largest 7,500 CFC's. Third, CFC's were classified by industrial group based on their principal business activity reported on Form 5471. Thus, it is not possible to measure the extent of any secondary business activities. Finally, pre-1986 statistics also included small and inactive CFC's. Therefore, some caution should be used in comparing statistics for the largest 7,500 CFC's to previously published statistics for years prior to 1986.

Explanation of Selected Terms

Controlled Foreign Corporation.--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. A "U.S. shareholder" for these purposes is defined as a U.S. person that owns 10 percent or more of the foreign corporation's total combined voting stock. (Ownership attribution rules apply here, and are discussed in Code section 958.) Apart from section 957 guidelines, a foreign corporation is "controlled," for purposes of these statistics, only if a single U.S. corporation satisfies either of the above 50 percent ownership requirements.

Country of Incorporation.--A CFC's country of incorporation was not necessarily the principal place where business was conducted. However, for 1990, less than 4 percent of the largest 7,500 CFC's reported a principal place of business other than their country of incorporation.

Current Earnings and Profits (Less Deficits) of Controlled Foreign Corporations.--The current portion of earnings and profits is the difference between beginning and end-of-year balances of accumulated earnings and profits available for distribution to the stockholders. Earnings and profits for tax purposes differs from both taxable income and income per books of account, but includes, for example, any tax-exempt income.

Distributions of Controlled Foreign Corporations.--The distributions of CFC's consisted primarily of dividends. Capital gain distributions and distributions paid out of capital (including capital stock, paid-in capital, and capital surplus) were generally not included.

OPEC Countries.--The members of the Organization of Petroleum Exporting Countries (OPEC) for 1990 were: Algeria, Ecuador, Gabon, Indonesia, Iran, Iraq, Kuwait, Libya, Nigeria, Qatar, Saudi Arabia, United Arab Emirates, and Venezuela.

Subpart F Income.--For 1990, Subpart F of the Internal Revenue Code required certain U.S. shareholders of a Controlled Foreign Corporation to include in gross income the shareholder's ratable share of the CFC's: (1) Subpart F income, (2) increase in 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, and (4) "factoring income." The Subpart F income of a CFC included: (1) certain insurance income, (2) "foreign base company" income, (3) international boycott participation income, (4) the sum of illegal bribes and other payments made to Government officials that would be unlawful under the Foreign Corrupt Practices Act of 1977, and (5) income derived from a country which is not recognized by the

United States, with which the United States does not conduct or has severed diplomatic relations, which repeatedly provides support for acts of international terrorism, or, for tax years beginning after January 1, 1988, the Republic of South Africa [3]. The total amount ($17.8 billion) reported for "Subpart F income" in Tables 1 through 3 is the shareholder's total pro rata share of includable income under the Subpart F rules. As such, the $17.8 billion is subject to U.S. tax, and includes Subpart F income (as defined above) of $13.5 billion, increases in earnings invested in U.S. property of $4.3 billion, previously excluded Subpart F income of $41.3 million, and factoring income of $8.0 million.

Tax Haven.--Tax haven countries are characterized by income tax rates that are lower than U.S. rates. In addition, financial and commercial information is frequently kept confidential. For purposes of the statistics, the following countries were classified as tax havens for 1990: Belize, Costa Rica, Panama, Barbados, Cayman Islands, Turks and Caicos Islands, Leeward Islands, Netherlands Antilles, Windward Islands, Antigua and Barbuda, Aruba, Bahamas, Bermuda, Luxembourg, Netherlands, Austria, Gibraltar, Liechtenstein, Monaco, Switzerland, Liberia, Bahrain, Singapore, and Hong Kong.

Total Receipts.--Receipts data on Controlled Foreign Corporations for 1990 are not altogether comparable with 1988, the last year for which statistics are available. For 1990, total receipts, consistent with other Statistics of Income data on corporations, equals business receipts (gross receipts from sales and operations), plus income from investments. For 1988, total receipts, as such, were not tabulated; instead, the term "business receipts" was used to describe data based on the larger of business receipts (gross receipts from sales and operations) and "total income." The latter is a tax return concept used to describe business receipts less cost of sales and operations, i.e., "gross profit," plus income from investments.

Notes and References

[1] Statistics of Income (SOI) studies on Controlled Foreign Corporations have historically been conducted every other year and, thus comparisons are made to 1988 data (see Latzy, John and Miller, Randy, "Controlled Foreign Corporations, 1988," *Statistics of Income Bulletin*, Fall 1992, Volume 12, Number 2). Previously published data for 1988 reported "business receipts," while the data included herein report "total receipts" (see "total receipts" in the *Explanation of Selected Terms* for definitions of these terms). Slight differences between these two measurements existed for 1990 as shown in Figure A. Overall, "total receipts" exceeded "business receipts" by approximately 3 percent and "total receipts" exceeded "business receipts" in all industrial divisions. Because of these differences, caution should be used when making comparisons to previous years based on receipts.

Figure A

Total Receipts and Business Receipts of the Largest 7,500 Controlled Foreign Corporations, 1990

[Money amounts are in thousands of dollars]

Industrial division	Total receipts	Business receipts
All industries	**1,111,407,020**	**1,080,135,455**
Agriculture, forestry and fishing	1,235,959	1,206,347
Mining	34,180,335	32,743,012
Construction	8,753,248	8,487,613
Manufacturing	629,398,700	609,643,852
Transportation and public utilities	15,469,041	14,876,475
Wholesale and retail trade	300,300,337	292,796,588
Finance, insurance and real estate	91,576,941	90,774,586
Services	29,742,444	28,881,867
Nature of business not allocable	750,015	725,115

[2] Based on unpublished data.

[3] For further information, see Latzy, John and Miller, Randy, "Controlled Foreign Corporations, 1988," *Statistics of Income Bulletin*, Fall 1992, Volume 12, Number 2.

Table 1.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Transactions by Type, by Selected Industrial Group of Controlled Foreign Corporation

[Money amounts are in thousands of dollars]

Selected industrial group of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns [1]	7,500 largest Controlled Foreign Corporations					
		Number of foreign corporations	Total assets	Total receipts	Current earnings and profits (less deficit) before taxes	Income taxes	Current earnings and profits (less deficit) after taxes
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All industries	**731**	**7,500**	**1,279,946,504**	**1,111,407,020**	**88,688,406**	**23,936,971**	**64,751,435**
Agriculture, forestry and fishing	**11**	**24**	**904,681**	**1,235,959**	**55,778**	**20,169**	**35,609**
Mining	**61**	**169**	**43,592,296**	**34,180,335**	**8,020,321**	**2,590,935**	**5,429,386**
Metal mining	13	19	2,278,249	1,350,117	228,560	39,945	188,615
Oil and gas extraction	46	142	40,566,031	32,420,672	7,812,159	2,550,870	5,261,289
Construction	**20**	**82**	**5,881,690**	**8,753,248**	**690,872**	**182,549**	**508,323**
General building contractors and operative builders	6	15	954,081	1,655,156	108,575	30,469	78,105
Heavy construction contractors	6	15	716,844	1,135,569	61,993	17,896	44,097
Special trade contractors	9	52	4,210,765	5,962,524	520,305	134,184	386,121
Manufacturing	**411**	**2,962**	**455,795,893**	**629,398,700**	**46,902,857**	**14,232,389**	**32,670,468**
Food and kindred products	44	324	35,717,817	54,833,663	5,037,193	1,573,124	3,464,069
Tobacco manufacturers	5	26	8,270,967	18,238,225	1,621,357	430,290	1,191,067
Textile mill products	11	27	1,153,859	996,938	4,407	3,956	451
Apparel and other textile products	12	30	2,310,163	3,224,362	346,825	72,010	274,815
Lumber and wood products	5	7	1,179,557	770,081	8,691	1,816	6,875
Furniture and fixtures	6	9	967,402	930,501	54,446	23,784	30,663
Paper and allied products	29	135	19,165,578	18,444,864	889,869	257,266	632,603
Printing and publishing	23	64	3,517,877	4,114,659	302,444	128,311	174,133
Chemicals and allied products	98	753	87,975,509	102,170,456	9,755,206	2,605,271	7,149,935
Petroleum (including integrated) and coal products	15	60	51,163,156	72,934,444	3,629,033	844,689	2,784,344
Rubber and miscellaneous plastics products	25	91	7,515,519	10,883,295	398,326	210,379	187,946
Stone, clay, and glass products	20	59	6,710,191	6,583,165	689,141	208,452	480,688
Primary metal industries	11	27	5,641,389	5,369,467	920,332	362,700	557,632
Fabricated metal products	57	178	11,233,400	12,857,063	1,013,029	330,089	682,940
Machinery, except electrical	67	278	79,696,645	92,117,805	10,234,719	3,153,472	7,081,246
Electrical and electronic equipment	82	348	37,484,129	55,011,142	3,522,330	726,265	2,796,065
Motor vehicles and transportation equipment	30	180	58,609,267	125,255,960	3,764,071	1,931,379	1,832,692
Transportation equipment, except motor vehicles	14	23	2,822,047	3,989,717	292,270	75,719	216,551
Instruments and related products	35	128	19,181,038	21,916,677	2,547,536	666,645	1,880,891
Transportation and public utilities	**61**	**180**	**20,936,285**	**15,469,041**	**2,014,581**	**412,528**	**1,602,053**
Transportation	42	115	10,115,915	8,610,250	766,893	58,817	708,076
Water transportation	21	61	6,633,484	5,082,395	629,468	14,228	615,240
Other transportation	26	54	3,482,432	3,527,855	137,425	44,589	92,836
Communication	10	21	4,438,030	2,306,551	470,959	137,359	333,600
Electric, gas and sanitary services	12	44	6,382,340	4,552,241	776,729	216,352	560,377

Footnotes at end of table.

Table 1.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Transactions by Type, by Selected Industrial Group of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected industrial group of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns [1]	7,500 largest Controlled Foreign Corporations					
		Number of foreign corporations	Total assets	Total receipts	Current earnings and profits (less deficit) before taxes	Income taxes	Current earnings and profits (less deficit) after taxes
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Wholesale and retail trade	**246**	**1,164**	**132,321,382**	**300,300,337**	**14,579,667**	**3,770,549**	**10,809,118**
Wholesale trade	223	1,042	113,516,022	267,569,149	13,386,088	3,374,634	10,011,454
Groceries and related products	10	21	1,849,880	4,109,066	1,006,890	50,412	956,478
Machinery, equipment and related supplies	37	132	11,842,521	29,896,265	982,018	368,748	613,270
Miscellaneous wholesale trade	199	889	99,823,622	233,563,818	11,397,180	2,955,474	8,441,705
Drugs, chemicals and allied products	50	178	17,626,104	23,486,135	1,929,681	501,350	1,428,330
Petroleum and petroleum products	16	139	40,773,643	102,364,638	5,163,529	1,083,766	4,079,763
Other wholesale trade	157	572	41,423,876	107,713,045	4,303,970	1,370,358	2,933,612
Retail trade	47	116	18,559,709	32,324,205	1,175,293	387,665	787,628
Food stores	5	7	1,990,564	6,356,431	220,571	33,796	186,774
Automotive dealers and service stations	8	17	2,737,013	6,153,157	287,242	94,820	192,422
Apparel and accessory stores	5	8	481,072	983,263	39,827	16,631	23,195
Eating and drinking places	6	30	4,180,115	4,394,801	310,910	112,253	198,657
Miscellaneous retail stores	19	45	4,082,433	5,324,202	139,040	84,632	54,408
Finance, insurance and real estate	**472**	**2,234**	**574,031,383**	**91,576,941**	**13,817,418**	**1,923,074**	**11,894,343**
Banking	40	211	114,988,162	14,890,355	-280,122	222,628	-502,750
Credit agencies other than banks	175	581	164,273,828	23,184,080	4,029,609	628,096	3,401,513
Security, commodity brokers and services	37	154	89,679,115	10,006,345	-826,313	238,721	-1,065,034
Insurance carriers	147	270	48,812,444	16,212,737	1,456,327	219,344	1,236,983
Insurance agents, brokers and service	20	82	7,537,160	2,999,568	408,316	117,007	291,309
Real estate	46	93	12,114,541	2,914,661	201,079	55,138	145,941
Holding and other investment companies, except bank holding companies	320	843	136,626,134	21,369,196	8,828,522	442,141	8,386,381
Services	**182**	**655**	**44,158,175**	**29,742,444**	**2,613,315**	**797,160**	**1,816,155**
Hotels and other lodging places	10	33	1,798,882	1,401,533	141,621	42,107	99,514
Business services	104	324	22,469,737	14,954,909	1,643,453	392,798	1,250,655
Auto repair, miscellaneous repair services	3	3	175,502	147,694	34,132	1,642	32,490
Amusement and recreational services	13	52	4,674,307	4,852,334	280,797	102,242	178,556
Nature of business not allocable	**20**	**30**	**2,324,720**	**750,015**	**-6,403**	**7,616**	**-14,019**

Footnotes at end of table.

Table 1.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Transactions by Type, by Selected Industrial Group of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected industrial group of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued						
	Foreign corporations with current earnings and profits (+) before taxes			Distributions from earnings and profits	Subpart F income	Receipts by foreign corporations from--	
	Current earnings and profits before taxes	Income taxes	Current earnings and profits after taxes			All related persons, total	U.S. corporation filing return
	(8)	(9)	(10)	(11)	(12)	(13)	(14)
All industries	**102,614,262**	**23,829,845**	**78,784,418**	**46,429,916**	**17,841,936**	**273,799,308**	**47,762,454**
Agriculture, forestry and fishing	**70,567**	**18,672**	**51,895**	**16,436**	**1,589**	**320,733**	**9,895**
Mining	**8,346,795**	**2,594,259**	**5,752,535**	**4,139,635**	**992,587**	**7,050,749**	**375,157**
Metal mining	262,009	39,945	222,065	20,431	99,475	98,513	--
Oil and gas extraction	8,058,390	2,554,195	5,504,195	4,096,830	893,113	6,899,608	364,850
Construction	**760,337**	**187,099**	**573,237**	**203,822**	**43,975**	**730,846**	**1,742**
General building contractors and operative builders	115,178	31,268	83,909	42,272	--	37,316	--
Heavy construction contractors	81,127	21,423	59,704	14,595	21,882	201,884	658
Special trade contractors	564,033	134,408	429,624	146,954	22,092	491,646	1,083
Manufacturing	**52,491,672**	**14,231,638**	**38,260,034**	**23,087,711**	**5,410,015**	**178,988,153**	**41,231,082**
Food and kindred products	5,329,588	1,570,875	3,758,713	2,007,747	225,555	8,658,400	412,450
Tobacco manufacturers	1,623,262	430,290	1,192,972	690,298	83,996	991,070	--
Textile mill products	55,719	14,459	41,260	26,746	33,101	176,771	4,823
Apparel and other textile products	360,911	72,010	288,901	130,211	18,312	1,367,063	777,331
Lumber and wood products	12,739	1,093	11,647	21,081	2,526	190,025	185,660
Furniture and fixtures	55,837	24,128	31,709	18,620	139	90,957	1,292
Paper and allied products	1,109,178	261,005	848,174	285,006	34,432	3,606,052	971,020
Printing and publishing	370,976	133,907	237,069	129,576	630	257,208	18,571
Chemicals and allied products	10,568,312	2,637,585	7,930,727	5,032,959	852,167	22,092,975	1,785,311
Petroleum (including integrated) and coal products	3,770,749	843,179	2,927,570	1,269,889	307,297	12,139,212	2,026,133
Rubber and miscellaneous plastics products	582,444	205,260	377,184	190,564	19,081	3,209,273	784,934
Stone, clay, and glass products	738,074	206,434	531,640	384,702	111,483	921,324	205,747
Primary metal industries	945,947	362,700	583,248	509,219	6,138	1,428,516	415,426
Fabricated metal products	1,131,702	328,907	802,795	295,134	61,776	1,400,995	174,694
Machinery, except electrical	10,902,072	3,135,197	7,766,875	5,701,382	772,039	40,503,686	3,691,136
Electrical and electronic equipment	4,149,411	723,786	3,425,624	1,331,262	511,208	22,610,998	6,586,218
Motor vehicles and transportation equipment	5,717,849	1,888,065	3,829,784	2,754,124	1,938,635	46,192,866	20,746,002
Transportation equipment, except motor vehicles	337,654	75,443	262,211	220,915	8,080	990,647	720,844
Instruments and related products	2,640,339	671,238	1,969,102	1,054,828	238,108	8,463,698	1,275,777
Transportation and public utilities	**2,221,086**	**421,923**	**1,799,163**	**1,025,449**	**414,135**	**3,740,576**	**143,876**
Transportation	896,798	63,973	832,825	625,933	370,293	2,393,020	132,063
Water transportation	651,603	14,143	637,460	444,382	358,536	2,022,046	131,384
Other transportation	245,195	49,830	195,365	181,551	11,756	370,975	678
Communication	516,378	137,220	379,158	73,138	1,207	89,327	--
Electric, gas and sanitary services	807,910	220,730	587,181	326,379	42,636	1,258,229	11,813

Footnotes at end of table.

Table 1.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Transactions by Type, by Selected Industrial Group of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected industrial group of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued						
	Foreign corporations with current earnings and profits (+) before taxes			Distributions from earnings and profits	Subpart F income	Receipts by foreign corporations from--	
	Current earnings and profits before taxes	Income taxes	Current earnings and profits after taxes			All related persons, total	U.S. corporation filing return
	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Wholesale and retail trade	**15,985,128**	**3,702,845**	**12,282,283**	**6,434,300**	**3,208,595**	**50,473,278**	**3,792,835**
Wholesale trade	14,577,592	3,295,606	11,281,986	5,436,526	3,182,356	49,006,279	3,714,179
Groceries and related products	1,025,182	50,412	974,770	1,262,401	704,498	997,844	157,823
Machinery, equipment and related supplies	1,159,074	334,681	824,393	294,817	133,886	5,465,149	942,887
Miscellaneous wholesale trade	12,393,336	2,910,514	9,482,822	3,879,308	2,343,973	42,543,287	2,613,469
Drugs, chemicals and allied products	2,107,448	474,438	1,633,010	1,095,451	461,659	5,841,312	200,049
Petroleum and petroleum products	5,200,799	1,079,576	4,121,223	1,102,101	930,490	15,669,101	56,066
Other wholesale trade	5,085,089	1,356,499	3,728,589	1,681,757	951,823	21,032,874	2,357,353
Retail trade	1,388,395	398,989	989,406	996,431	26,239	1,293,824	69,343
Food stores	220,571	33,796	186,774	475,055	608	194,608	--
Automotive dealers and service stations	317,372	94,589	222,783	75,026	5,628	453,700	16,506
Apparel and accessory stores	39,944	16,631	23,313	2,787	1,146	--	--
Eating and drinking places	343,409	112,246	231,163	295,091	2,242	85,863	10,991
Miscellaneous retail stores	241,602	85,484	156,119	4,893	1,764	397,206	31,935
Finance, insurance and real estate	**19,329,044**	**1,885,259**	**17,443,785**	**10,518,766**	**7,341,297**	**26,799,265**	**1,640,928**
Banking	1,351,903	206,606	1,145,297	549,767	576,640	3,185,239	193,770
Credit agencies other than banks	4,820,106	590,898	4,229,208	2,058,136	2,851,199	7,290,341	828,088
Security, commodity brokers and services	729,483	221,270	508,213	99,594	148,215	2,143,649	6,803
Insurance carriers	1,835,100	217,854	1,617,246	729,184	1,141,457	2,323,829	256,154
Insurance agents, brokers and service	420,792	115,064	305,727	203,768	40,181	226,488	3,381
Real estate	252,381	60,551	191,830	74,097	21,244	516,112	40,312
Holding and other investment companies, except bank holding companies	9,919,280	473,016	9,446,264	6,804,219	2,562,361	11,113,607	312,420
Services	**3,367,362**	**780,363**	**2,586,999**	**999,303**	**428,387**	**5,663,378**	**566,938**
Hotels and other lodging places	166,574	41,886	124,688	48,123	14,264	28,183	54
Business services	1,946,459	397,237	1,549,222	669,592	240,690	4,429,157	492,425
Auto repair, miscellaneous repair services	34,132	1,642	32,490	4,228	4,263	15,387	13,710
Amusement and recreational services	474,139	96,647	377,492	69,474	12,850	122,858	--
Nature of business not allocable	**42,271**	**7,786**	**34,486**	**4,494**	**1,356**	**32,330**	**--**

Footnotes at end of table.

Table 1.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Transactions by Type, by Selected Industrial Group of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected industrial group of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued							
	Receipts by foreign corporations from--Continued			Payments by foreign corporations to--				
	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporation controlled by U.S. corporation filing return	All other related persons	All related persons, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporation controlled by U.S. corporation filing return	All other related persons
	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
All industries	**41,847,741**	**183,671,939**	**517,174**	**318,694,008**	**87,845,241**	**70,822,306**	**159,697,349**	**329,112**
Agriculture, forestry and fishing	**8,349**	**302,488**	**--**	**121,571**	**34,640**	**67,891**	**19,040**	**--**
Mining	**4,988,652**	**1,670,706**	**16,234**	**6,233,699**	**1,136,212**	**4,163,045**	**934,411**	**31**
Metal mining	93,108	5,406	--	80,235	10,941	32,372	36,922	--
Oil and gas extraction	4,874,759	1,643,766	16,234	6,065,136	1,099,712	4,126,585	838,807	31
Construction	**81,425**	**647,680**	**--**	**836,083**	**21,725**	**220,355**	**594,002**	**--**
General building contractors and operative builders	281	37,035	--	53,725	6,926	36,629	10,170	--
Heavy construction contractors	28,673	172,553	--	146,253	95	23,567	122,592	--
Special trade contractors	52,471	438,092	--	636,104	14,705	160,159	461,241	--
Manufacturing	**17,242,341**	**120,092,406**	**422,323**	**183,544,645**	**57,422,173**	**39,594,107**	**86,403,038**	**125,327**
Food and kindred products	292,417	7,953,533	--	9,729,713	1,188,445	1,704,466	6,836,803	--
Tobacco manufacturers	52,305	938,764	--	2,360,022	6,058	1,069,847	1,284,117	--
Textile mill products	8,087	163,862	--	124,918	21,318	41,953	61,646	--
Apparel and other textile products	53,845	535,888	--	462,935	2,413	147,987	312,535	--
Lumber and wood products	--	4,365	--	30,195	17,409	7,394	5,392	--
Furniture and fixtures	40,710	48,955	--	70,236	43,789	2,387	24,060	--
Paper and allied products	357,331	2,227,301	50,400	1,705,707	518,358	218,658	955,829	12,863
Printing and publishing	11,141	227,496	--	603,767	268,157	136,984	198,626	--
Chemicals and allied products	1,869,131	18,427,388	11,145	28,929,071	7,552,972	5,601,715	15,750,056	24,328
Petroleum (including integrated) and coal products	3,051,144	7,061,936	--	18,271,644	6,496,355	6,896,852	4,878,436	--
Rubber and miscellaneous plastics products	174,040	2,250,299	--	3,424,029	1,046,746	156,587	2,220,696	--
Stone, clay, and glass products	117,438	598,133	7	1,149,296	363,350	233,730	552,217	--
Primary metal industries	214,508	441,856	356,726	1,464,696	574,900	295,437	507,389	86,969
Fabricated metal products	147,203	1,079,093	5	2,060,038	479,134	527,888	1,053,017	--
Machinery, except electrical	7,718,905	29,089,604	4,041	45,592,681	4,396,694	16,992,744	24,202,076	1,167
Electrical and electronic equipment	1,574,777	14,450,003	--	20,264,280	9,384,262	2,421,071	8,458,947	--
Motor vehicles and transportation equipment	1,249,794	24,197,070	--	34,382,799	20,691,810	1,768,875	11,922,114	--
Transportation equipment, except motor vehicles	14,325	255,477	--	709,027	189,585	136,481	382,960	--
Instruments and related products	122,075	7,065,846	--	7,314,355	2,845,446	317,485	4,151,424	--
Transportation and public utilities	**1,798,894**	**1,761,755**	**36,051**	**2,317,223**	**206,258**	**205,667**	**1,902,295**	**3,003**
Transportation	795,089	1,429,818	36,051	1,442,680	143,961	139,989	1,158,729	--
Water transportation	785,980	1,104,681	--	1,067,256	100,094	87,328	879,834	--
Other transportation	9,109	325,136	36,051	375,423	43,867	52,661	278,895	--
Communication	10,249	79,078	--	276,460	261	46,086	227,110	3,003
Electric, gas and sanitary services	993,556	252,859	--	598,084	62,036	19,591	516,456	--

Footnotes at end of table.

Table 1.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Transactions by Type, by Selected Industrial Group of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected industrial group of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued							
	Receipts by foreign corporations from--Continued			Payments by foreign corporations to--				
	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporation controlled by U.S. corporation filing return	All other related persons	All related persons, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporation controlled by U.S. corporation filing return	All other related persons
	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
Wholesale and retail trade	**10,784,425**	**35,881,797**	**14,221**	**93,400,399**	**23,553,911**	**15,784,991**	**53,889,352**	**172,145**
Wholesale trade	10,691,184	34,586,696	14,221	86,713,182	23,066,531	13,956,894	49,517,612	172,145
Groceries and related products	323	839,698	--	2,529,447	157,998	1,068,839	1,302,610	--
Machinery, equipment and related supplies	174,300	4,347,962	--	13,051,774	4,248,444	766,761	8,036,569	--
Miscellaneous wholesale trade	10,516,561	29,399,036	14,221	71,131,961	18,660,089	12,121,293	40,178,433	172,145
Drugs, chemicals and allied products	215,344	5,425,918	--	11,300,262	2,635,728	1,756,441	6,908,093	--
Petroleum and petroleum products	8,307,975	7,297,929	7,131	21,204,700	3,870,615	7,225,047	10,109,038	--
Other wholesale trade	1,993,242	16,675,189	7,090	38,626,999	12,153,747	3,139,805	23,161,302	172,145
Retail trade	86,720	1,137,761	--	6,401,638	343,665	1,782,753	4,275,220	--
Food stores	--	194,608	--	1,230,823	1,794	577,387	651,642	--
Automotive dealers and service stations	332	436,862	--	2,350,780	6,144	3,607	2,341,028	--
Apparel and accessory stores	--	--	--	60,194	9,467	12,737	37,990	--
Eating and drinking places	26,790	48,083	--	626,067	104,139	422,107	99,821	--
Miscellaneous retail stores	42,161	323,110	--	1,627,442	162,979	396,452	1,068,012	--
Finance, insurance and real estate	**5,701,473**	**19,428,519**	**28,346**	**26,140,128**	**4,674,325**	**9,341,294**	**12,121,139**	**3,369**
Banking	1,904,682	1,086,786	--	3,780,284	292,290	2,142,644	1,345,351	--
Credit agencies other than banks	1,565,055	4,897,198	--	6,891,256	1,024,252	2,066,529	3,798,096	2,379
Security, commodity brokers and services	844,358	1,292,488	--	2,897,410	114,337	1,107,145	1,675,927	--
Insurance carriers	752,552	1,286,778	28,346	1,291,064	192,007	318,430	779,637	990
Insurance agents, brokers and service	46,982	176,125	--	356,646	19,289	47,366	289,991	--
Real estate	76,171	399,628	--	567,141	58,318	89,945	418,878	--
Holding and other investment companies, except bank holding companies	511,673	10,289,514	--	10,356,327	2,973,832	3,569,235	3,813,259	--
Services	**1,239,688**	**3,856,752**	**--**	**6,034,000**	**792,285**	**1,402,684**	**3,813,794**	**25,237**
Hotels and other lodging places	1,669	26,460	--	121,690	29,056	74,427	18,207	--
Business services	931,881	3,004,852	--	3,625,755	509,066	606,405	2,507,311	2,973
Auto repair, miscellaneous repair services	--	1,677	--	6,895	1,323	2	5,570	--
Amusement and recreational services	14,622	108,235	--	496,801	95,836	98,780	298,174	4,011
Nature of business not allocable	**2,495**	**29,835**	**--**	**66,260**	**3,712**	**42,271**	**20,277**	**--**

[1] Number of returns is not additive because some U.S. corporations have Controlled Foreign Corporations in more than one industrial group.

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

Table 2.–U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Transactions by Type, by Selected Country of Incorporation of Controlled Foreign Corporation

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns [1]	7,500 largest Controlled Foreign Corporations					
		Number of foreign corporations	Total assets	Total receipts	Current earnings and profits (less deficit) before taxes	Income taxes	Current earnings and profits (less deficit) after taxes
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All geographic areas	**731**	**7,500**	**1,279,946,504**	**1,111,407,020**	**88,688,406**	**23,936,971**	**64,751,435**
Canada	**443**	**819**	**188,592,565**	**174,296,522**	**10,538,090**	**3,349,694**	**7,188,395**
Latin America, total	**241**	**754**	**80,150,466**	**73,563,910**	**8,158,510**	**1,805,094**	**6,353,416**
Mexico	79	115	9,708,719	13,205,361	1,182,626	447,214	735,412
Central America, total	45	79	8,145,671	5,917,537	1,502,017	60,518	1,441,498
Costa Rica	6	7	259,389	221,727	195	1,120	925
Honduras	5	6	188,059	383,480	26,874	8,781	18,093
Panama	41	63	7,529,556	5,081,544	1,443,578	44,772	1,398,806
Caribbean countries, total	79	104	21,798,795	5,227,545	1,277,479	127,521	1,149,958
Cayman Islands (British)	60	81	20,377,302	4,639,535	1,071,259	103,354	967,905
Dominican Republic	4	4	457,298	297,074	129,826	17,109	112,717
South America, total	162	456	40,497,281	49,213,467	4,196,388	1,169,841	3,026,547
Argentina	44	54	3,834,178	4,658,939	112,432	34,833	77,598
Brazil	135	259	28,532,012	37,814,102	3,403,598	1,000,180	2,403,418
Chile	28	60	4,252,533	2,633,986	304,851	17,059	287,792
Colombia	21	24	1,013,162	1,705,088	188,877	57,472	131,406
Peru	3	3	122,060	128,283	22,991	4,383	18,608
Uruguay	10	10	846,450	134,518	24,916	3,075	21,842
Venezuela	33	43	1,838,202	2,076,053	138,030	52,650	85,380
Other Western Hemisphere, total	**229**	**407**	**70,510,906**	**41,498,750**	**4,271,027**	**303,049**	**3,967,978**
Bahamas	25	39	8,906,936	3,636,874	737,580	124,943	612,637
Bermuda	147	226	29,760,630	18,771,947	2,310,727	112,702	2,198,025
Netherlands Antilles	96	131	29,665,439	3,026,366	1,066,075	55,526	1,010,549
Europe, total	**518**	**4,142**	**751,625,696**	**660,327,162**	**49,549,471**	**13,034,347**	**36,515,124**
European Economic Community, total	506	3,726	691,773,370	591,041,240	45,324,245	12,177,705	33,146,541
Belgium	133	224	32,780,563	26,376,146	2,347,287	406,600	1,940,687
Denmark	39	50	3,848,247	3,781,578	281,483	101,961	179,523
France (including Andorra)	239	504	65,695,198	83,505,632	4,930,243	1,565,191	3,365,052
Greece	19	23	893,002	1,935,422	66,746	26,128	40,618
Ireland	50	67	6,035,321	5,623,959	1,538,366	47,187	1,491,179
Italy (including San Marino)	197	368	51,132,195	56,707,179	4,728,502	1,457,936	3,270,566
Luxembourg	21	31	7,067,678	2,052,427	247,832	58,197	189,635
Netherlands	189	397	76,012,583	57,378,078	7,507,404	1,464,125	6,043,279
Portugal	28	36	2,509,303	3,508,991	326,856	93,238	233,618
Spain	146	223	27,132,141	26,057,936	2,481,620	774,539	1,707,081
United Kingdom	408	1,257	298,694,741	189,762,719	11,766,192	3,263,307	8,502,885
West Germany	256	546	119,972,398	134,351,175	9,101,714	2,919,295	6,182,419
Other West European countries, total	165	410	58,946,327	68,768,123	4,213,307	850,844	3,362,463
Austria	35	52	5,174,951	6,082,216	536,778	162,666	374,112
Finland	19	22	1,792,025	2,960,654	154,685	59,882	94,803
Liechtenstein	4	5	185,916	220,915	19,899	686	19,213
Norway	30	34	3,383,905	4,046,803	246,371	59,995	186,376
Sweden	50	64	7,245,368	9,989,937	-389,238	75,661	-464,899
Switzerland	119	209	39,986,409	43,659,694	3,620,632	465,150	3,155,482
Turkey	16	20	1,048,305	1,652,473	2,325	25,621	-23,296
East European countries	6	6	905,999	517,799	11,918	5,799	6,119

Footnotes at end of table.

Table 2.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Transactions by Type, by Selected Country of Incorporation of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns [1]	7,500 largest Controlled Foreign Corporations					
		Number of foreign corporations	Total assets	Total receipts	Current earnings and profits (less deficit) before taxes	Income taxes	Current earnings and profits (less deficit) after taxes
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Africa, total	**55**	**114**	**9,541,527**	**9,006,151**	**948,686**	**291,421**	**657,265**
North Africa, total	7	10	374,159	726,943	42,651	15,914	26,737
Egypt	4	4	145,314	276,383	19,987	7,216	12,771
Morocco	3	3	138,099	141,663	13,448	5,480	7,969
East Africa	5	6	267,556	291,166	52,158	19,026	33,132
West and Central Africa, total	29	63	7,094,935	5,283,295	663,543	197,789	465,754
Liberia	21	40	4,929,444	2,603,204	175,249	17,554	157,695
Nigeria	8	8	1,165,813	1,557,064	428,651	143,170	285,481
Zaire	3	3	186,907	127,438	14,039	3,425	10,613
Southern Africa, total	25	35	1,804,877	2,704,747	190,334	58,692	131,642
Zimbabwe	5	8	397,913	449,305	58,389	20,337	38,052
South Africa (including Namibia)	20	23	1,228,952	1,888,331	112,275	30,368	81,907
Asia, total	**243**	**795**	**116,758,731**	**109,037,188**	**12,040,356**	**4,133,451**	**7,906,906**
Middle East, total	14	21	1,106,942	1,258,491	131,797	16,599	115,198
Israel	8	13	694,266	685,462	99,825	16,376	83,450
Saudi Arabia	3	5	334,429	397,232	41,375	70	41,305
Southern and Southeastern Asia, total	101	212	20,788,508	23,240,750	3,447,241	892,801	2,554,440
India	9	10	592,502	770,062	106,984	43,846	63,138
Indonesia	10	12	957,076	1,618,380	884,864	481,355	403,509
Malaysia	18	28	2,486,438	3,899,445	303,575	46,077	257,498
Pakistan	3	3	74,062	120,465	16,630	6,989	9,640
Philippines	23	24	1,874,306	1,582,794	277,258	60,622	216,636
Singapore	63	90	9,759,066	10,051,565	1,292,235	94,535	1,197,700
Thailand	33	41	4,101,346	5,131,339	559,745	158,451	401,293
Eastern Asia, total	208	562	94,863,281	84,537,948	8,461,319	3,224,051	5,237,268
China	7	8	309,733	247,871	61,643	1,028	60,615
Taiwan	40	47	4,191,620	6,301,580	708,057	118,160	589,898
Hong Kong	92	143	30,489,722	13,067,115	1,786,625	224,687	1,561,938
Japan	155	321	53,856,711	61,927,739	5,415,995	2,737,597	2,678,398
South Korea	34	43	6,015,495	2,993,642	488,999	142,580	346,419
Oceania, total	**189**	**408**	**55,887,717**	**36,376,691**	**2,527,590**	**929,932**	**1,597,658**
Australia	179	342	48,692,521	33,628,327	2,434,844	891,417	1,543,427
New Zealand	41	62	6,976,701	2,577,354	94,170	37,244	56,927
Puerto Rico and U.S. Possessions, total	**44**	**61**	**6,878,895**	**7,300,646**	**654,676**	**89,983**	**564,693**
Puerto Rico	33	45	4,103,086	1,758,719	312,300	50,639	261,661
U.S. Possessions, total	12	16	2,775,809	5,541,927	342,376	39,344	303,032
Guam	6	7	642,566	2,017,034	264,317	34,081	230,236
Virgin Islands	7	9	2,133,244	3,524,893	78,059	5,263	72,796
OPEC countries (included above)	**49**	**72**	**4,677,221**	**5,756,968**	**1,502,055**	**680,814**	**821,241**
Tax haven countries (included above)	**430**	**1,543**	**273,021,785**	**186,994,767**	**22,042,995**	**2,943,829**	**19,099,165**

Footnotes at end of table.

Table 2.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Transactions by Type, by Selected Country of Incorporation of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued						
	Foreign corporations with current earnings and profits (+) before taxes			Distributions from earnings and profits	Subpart F income	Receipts by foreign corporations from--	
	Current earnings and profits before taxes	Income taxes	Current earnings and profits after taxes			All related persons, total	U.S. corporation filing return
	(8)	(9)	(10)	(11)	(12)	(13)	(14)
All geographic areas	**102,614,262**	**23,829,845**	**78,784,418**	**46,429,916**	**17,841,936**	**273,799,308**	**47,762,454**
Canada	**12,062,627**	**3,408,701**	**8,653,926**	**5,950,116**	**1,293,543**	**40,074,499**	**22,507,713**
Latin America, total	**9,501,388**	**1,676,206**	**7,825,182**	**3,862,515**	**2,207,478**	**14,496,318**	**3,270,854**
Mexico	1,367,391	416,842	950,549	429,224	34,185	2,793,427	1,820,369
Central America, total	1,526,447	57,656	1,468,792	1,640,770	1,168,748	3,243,925	159,893
Costa Rica	13,845	1,120	12,725	1,339	2,295	59,497	1,677
Honduras	26,941	8,618	18,324	14,399	2,942	121,104	61,321
Panama	1,454,292	42,073	1,412,219	1,617,495	1,163,512	2,979,761	96,895
Caribbean countries, total	1,354,856	125,402	1,229,455	700,901	472,337	2,198,668	701,251
Cayman Islands (British)	1,143,751	101,456	1,042,295	655,136	421,430	2,079,289	661,267
Dominican Republic	134,711	16,887	117,824	21,011	-	3,840	-
South America, total	5,252,693	1,076,306	4,176,387	1,091,619	532,208	6,260,298	589,341
Argentina	348,002	26,433	321,570	116,061	32,873	1,018,017	5,032
Brazil	4,068,360	917,664	3,150,695	812,999	352,552	4,809,404	485,531
Chile	346,168	16,988	329,179	85,005	116,287	172,329	10,666
Colombia	194,058	56,399	137,659	54,848	9,965	123,712	83,309
Peru	34,105	4,383	29,722	207	-	12,900	206
Uruguay	28,168	3,075	25,093	5,034	8,074	6,602	221
Venezuela	230,728	51,365	179,363	13,948	12,257	105,239	4,378
Other Western Hemisphere, total	**4,563,328**	**301,942**	**4,261,386**	**3,030,219**	**2,873,064**	**15,813,608**	**1,503,878**
Bahamas	765,584	124,903	640,681	405,895	108,467	559,550	32,998
Bermuda	2,519,598	112,434	2,407,164	1,540,191	1,687,581	11,269,291	311,564
Netherlands Antilles	1,111,692	54,726	1,056,966	960,468	969,125	2,166,304	571,354
Europe, total	**58,687,516**	**13,000,574**	**45,686,943**	**26,971,302**	**9,494,862**	**164,529,551**	**9,455,844**
European Economic Community, total	53,300,846	12,145,712	41,155,133	24,449,788	7,801,359	148,815,899	8,474,475
Belgium	2,487,988	407,320	2,080,668	1,484,727	916,158	10,466,161	252,447
Denmark	343,643	101,961	241,682	111,575	6,641	680,768	48,888
France (including Andorra)	5,619,228	1,584,605	4,034,623	1,908,085	306,871	18,040,646	935,706
Greece	91,072	25,105	65,967	28,824	6,811	32,236	2,211
Ireland	1,555,231	47,085	1,508,145	937,501	104,537	1,850,357	85,074
Italy (including San Marino)	5,079,877	1,400,921	3,678,956	1,910,301	355,044	7,903,976	422,563
Luxembourg	262,415	57,307	205,107	218,837	25,349	1,396,853	74,068
Netherlands	7,705,763	1,462,018	6,243,745	3,631,195	1,030,278	24,146,661	1,064,192
Portugal	347,223	93,217	254,006	198,085	87,799	776,680	8,720
Spain	2,800,062	774,280	2,025,782	661,366	794,960	4,519,663	257,577
United Kingdom	17,232,427	3,278,828	13,953,599	9,146,682	2,196,112	43,418,115	2,707,121
West Germany	9,775,916	2,913,065	6,862,852	4,212,611	1,970,799	35,583,783	2,615,909
Other West European countries, total	5,347,210	849,063	4,498,147	2,506,084	1,687,615	15,713,649	981,369
Austria	562,958	161,066	401,892	115,400	217,920	1,299,525	61,599
Finland	170,694	55,765	114,929	105,497	3,373	91,415	1,602
Liechtenstein	22,774	686	22,088	46,379	13,644	80,026	42
Norway	297,969	60,870	237,099	57,267	67,606	428,826	108,275
Sweden	385,389	84,338	301,051	129,468	13,469	3,032,692	10,520
Switzerland	3,782,253	459,788	3,322,464	1,962,213	1,357,328	10,640,252	799,060
Turkey	103,245	25,366	77,879	74,502	13,649	136,160	230
East European countries	39,461	5,799	33,662	15,430	5,889	4	-

Footnotes at end of table.

Table 2.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Transactions by Type, by Selected Country of Incorporation of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued						
	Foreign corporations with current earnings and profits (+) before taxes			Distributions from earnings and profits	Subpart F income	Receipts by foreign corporations from--	
	Current earnings and profits before taxes	Income taxes	Current earnings and profits after taxes			All related persons, total	U.S. corporation filing return
	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Africa, total	**979,809**	**291,138**	**688,672**	**558,263**	**215,935**	**2,727,987**	**345,690**
North Africa, total	48,514	15,914	32,600	11,928	3,368	10,753	179
Egypt	25,850	7,216	18,634	7,325	2,839	655	172
Morocco	13,448	5,480	7,969	2,793	529	9,655	7
East Africa	52,158	19,026	33,132	1,055	1,960	46,907	-
West and Central Africa, total	687,843	197,703	490,140	464,364	142,802	2,620,233	320,349
Liberia	198,396	17,476	180,919	141,467	137,306	1,143,691	62,538
Nigeria	428,651	143,170	285,481	295,098	3,120	1,293,733	256,744
Zaire	14,039	3,425	10,613	5,887	2,376	1,500	1,067
Southern Africa, total	191,294	58,494	132,799	80,916	67,804	50,094	25,163
Zimbabwe	58,510	20,140	38,370	24,859	-	8,354	-
South Africa (including Namibia)	112,476	30,368	82,109	51,589	60,874	41,689	25,163
Asia, total	**12,632,267**	**4,132,263**	**8,500,004**	**4,459,630**	**1,488,263**	**28,737,907**	**8,517,760**
Middle East, total	150,656	13,737	136,918	69,252	-	534,127	239,896
Israel	104,987	13,737	91,250	35,801	-	417,638	238,006
Saudi Arabia	43,861	-	43,861	33,451	-	113,828	81
Southern and Southeastern Asia, total	3,524,362	886,891	2,637,472	1,047,432	454,890	12,416,240	4,434,163
India	106,984	43,846	63,138	21,776	368	85,973	24,440
Indonesia	894,455	481,355	413,099	270,645	1,295	18,389	536
Malaysia	306,833	45,636	261,197	41,654	18,426	2,651,716	1,258,210
Pakistan	16,630	6,989	9,640	6,663	-	152	-
Philippines	291,623	59,335	232,288	27,563	52,069	372,366	101,758
Singapore	1,321,353	91,980	1,229,374	450,164	361,836	7,647,994	2,311,041
Thailand	580,485	156,823	423,661	228,467	17,524	1,604,295	738,177
Eastern Asia, total	8,957,249	3,231,636	5,725,613	3,342,946	1,033,373	15,787,540	3,843,701
China	61,643	1,028	60,615	-	58	34,941	434
Taiwan	717,586	117,967	599,619	468,175	53,921	1,033,438	334,424
Hong Kong	1,859,514	224,316	1,635,199	1,023,116	535,454	4,088,254	1,611,295
Japan	5,778,222	2,745,758	3,032,464	1,789,144	396,634	9,867,685	1,535,260
South Korea	540,285	142,568	397,717	62,512	47,306	763,223	362,287
Oceania, total	**3,520,875**	**929,118**	**2,591,757**	**1,288,135**	**250,520**	**4,280,849**	**421,670**
Australia	3,319,922	887,154	2,432,767	1,239,787	229,739	3,972,467	399,650
New Zealand	178,105	40,692	137,413	44,249	20,782	307,546	22,020
Puerto Rico and U.S. Possessions, total	**666,452**	**89,904**	**576,548**	**309,736**	**18,272**	**3,138,589**	**1,739,044**
Puerto Rico	323,452	50,566	272,886	143,354	11,061	414,461	-
U.S. Possessions, total	343,000	39,338	303,662	166,382	7,210	2,724,128	1,739,044
Guam	264,558	34,081	230,477	144,497	-	106,789	-
Virgin Islands	78,442	5,257	73,184	21,885	7,210	2,617,339	1,739,044
OPEC countries (included above)	**1,608,844**	**679,270**	**929,574**	**616,659**	**16,871**	**1,532,026**	**261,739**
Tax haven countries (included above)	**22,971,138**	**2,924,960**	**20,046,178**	**12,927,498**	**8,186,670**	**71,493,902**	**8,287,320**

Footnotes at end of table.

Table 2.–U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Transactions by Type, by Selected Country of Incorporation of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued							
	Receipts by foreign corporations from--Continued			Payments by foreign corporations to--				
	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporation controlled by U.S. corporation filing return	All other related persons	All related persons, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporation controlled by U.S. corporation filing return	All other related persons
	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
All geographic areas	**41,847,741**	**183,671,939**	**517,174**	**318,694,008**	**87,845,241**	**70,822,306**	**159,697,349**	**329,112**
Canada	**9,458,848**	**8,067,253**	**40,684**	**40,909,546**	**24,064,239**	**9,895,593**	**6,936,352**	**13,361**
Latin America, total	**3,056,937**	**8,150,207**	**18,319**	**15,892,772**	**5,838,663**	**4,819,828**	**5,197,065**	**37,215**
Mexico	426,987	546,070	–	4,302,515	2,971,249	666,300	664,966	–
Central America, total	444,316	2,623,378	16,338	3,187,102	520,468	1,930,144	708,407	28,083
Costa Rica	24	51,439	6,357	69,927	8,086	29,621	4,623	27,597
Honduras	5,976	53,808	–	117,022	80,092	13,797	23,133	–
Panama	438,316	2,444,290	259	2,983,906	431,300	1,877,705	674,901	–
Caribbean countries, total	454,684	1,042,734	–	2,349,126	961,846	693,075	690,194	4,011
Cayman Islands (British)	427,560	990,462	–	2,197,292	944,333	648,687	600,261	4,011
Dominican Republic	3,840	–	–	22,474	–	1,463	21,011	–
South America, total	1,730,949	3,938,025	1,981	6,054,028	1,385,100	1,530,308	3,133,499	5,121
Argentina	92,684	918,320	1,981	646,898	186,880	240,614	214,283	5,121
Brazil	1,573,537	2,750,336	–	4,200,815	813,334	905,641	2,481,840	–
Chile	36,406	125,258	–	290,395	91,804	89,195	109,396	–
Colombia	7,290	33,113	–	344,198	83,760	75,819	184,619	–
Peru	8,342	4,352	–	38,284	4,002	21,650	12,633	–
Uruguay	3,077	3,305	–	28,350	2,322	13,802	12,226	–
Venezuela	9,123	91,738	–	500,283	202,998	179,906	117,379	–
Other Western Hemisphere, total	**9,136,233**	**5,144,780**	**28,718**	**12,753,206**	**3,026,526**	**3,053,181**	**6,558,581**	**114,918**
Bahamas	45,110	481,442	–	1,197,891	203,755	370,244	623,892	–
Bermuda	7,676,882	3,252,499	28,346	7,021,930	558,027	2,239,212	4,224,568	123
Netherlands Antilles	1,118,704	476,246	–	1,276,625	694,889	324,736	257,000	–
Europe, total	**11,202,831**	**143,850,494**	**20,383**	**198,637,665**	**36,896,401**	**38,783,781**	**122,854,683**	**102,801**
European Economic Community, total	10,600,324	129,720,718	20,383	176,015,040	31,922,645	34,681,388	109,372,174	38,832
Belgium	587,848	9,625,866	–	8,917,606	1,303,731	1,024,046	6,586,856	2,973
Denmark	41,430	590,451	–	1,338,191	182,705	258,860	896,625	–
France (including Andorra)	1,251,155	15,853,785	–	24,085,253	3,152,432	4,867,686	16,065,134	–
Greece	5,249	24,775	–	320,066	44,120	60,138	215,808	–
Ireland	72,689	1,692,594	–	2,019,169	908,439	328,957	779,394	2,379
Italy (including San Marino)	655,490	6,822,867	3,057	17,167,037	2,880,729	3,470,424	10,814,717	1,167
Luxembourg	167,663	1,155,123	–	610,789	89,729	206,646	314,414	–
Netherlands	935,789	22,146,680	–	26,461,908	6,856,540	3,922,151	15,683,218	–
Portugal	22,108	745,852	–	1,294,594	102,119	388,812	803,663	–
Spain	231,225	4,030,840	21	6,997,672	679,384	1,004,987	5,313,301	–
United Kingdom	5,023,202	35,670,488	17,304	52,926,798	7,748,745	13,085,621	32,060,118	32,314
West Germany	1,606,477	31,361,397	–	33,875,958	7,973,970	6,063,060	19,838,928	–
Other West European countries, total	602,503	14,129,777	–	22,607,559	4,973,065	4,089,636	13,480,889	63,969
Austria	56,802	1,181,123	–	2,027,380	159,540	334,794	1,533,045	–
Finland	3,735	86,077	–	642,369	74,852	124,004	443,513	–
Liechtenstein	–	79,984	–	64,536	31,268	9,269	24,000	–
Norway	28,931	291,619	–	1,516,196	317,473	665,654	469,100	63,969
Sweden	228,400	2,793,772	–	2,970,344	277,154	558,749	2,134,440	–
Switzerland	217,255	9,623,937	–	14,865,322	4,091,956	2,301,387	8,471,980	–
Turkey	67,379	68,551	–	500,294	20,584	78,925	400,784	–
East European countries	4	–	–	15,067	691	12,757	1,619	–

Footnotes at end of table.

Table 2.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, Subpart F Income, and Transactions by Type, by Selected Country of Incorporation of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations--Continued							
	Receipts by foreign corporations from--Continued			Payments by foreign corporations to--				
	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporation controlled by U.S. corporation filing return	All other related persons	All related persons, total	U.S. corporation filing return	Domestic corporations controlled by U.S. corporation filing return	Any foreign corporation controlled by U.S. corporation filing return	All other related persons
	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
Africa, total	**2,024,435**	**339,032**	**18,829**	**1,125,035**	**199,794**	**509,215**	**413,883**	**2,143**
North Africa, total	1,532	9,042	--	66,174	7,815	17,725	40,633	--
Egypt	441	43	--	30,870	2,891	14,113	13,866	--
Morocco	1,092	8,556	--	29,269	4,924	72	24,272	--
East Africa	25,153	21,005	748	62,907	--	60,757	2,150	--
West and Central Africa, total	1,996,282	285,521	18,081	761,081	90,052	415,292	253,593	2,143
Liberia	807,487	273,665	--	322,801	21,673	79,776	221,352	--
Nigeria	1,027,776	9,213	--	306,824	62,724	234,624	9,476	--
Zaire	433	--	--	10,740	4,859	4,222	1,659	--
Southern Africa, total	1,467	23,464	--	234,873	101,926	15,440	117,507	--
Zimbabwe	--	8,354	--	34,838	8,560	1,217	25,061	--
South Africa (including Namibia)	1,416	15,110	--	195,077	93,366	13,500	88,211	--
Asia, total	**5,411,015**	**14,759,732**	**49,400**	**37,146,327**	**12,250,934**	**11,269,523**	**13,588,085**	**37,785**
Middle East, total	59,979	234,251	--	407,585	108,606	100,173	198,807	--
Israel	59,936	119,696	--	228,110	97,260	18,368	112,482	--
Saudi Arabia	--	113,747	--	127,308	4,075	46,274	76,959	--
Southern and Southeastern Asia, total	2,203,652	5,778,425	--	11,390,014	3,949,548	3,351,569	4,088,897	--
India	986	60,547	--	93,173	37,876	729	54,567	--
Indonesia	2,468	15,385	--	247,882	154,952	18,405	74,525	--
Malaysia	84,467	1,309,039	--	2,239,981	911,621	789,825	538,535	--
Pakistan	84	67	--	6,961	3,078	904	2,979	--
Philippines	24,483	246,126	--	546,950	66,701	46,754	433,495	--
Singapore	1,907,373	3,429,580	--	5,450,035	1,672,728	1,828,213	1,949,094	--
Thailand	157,479	708,639	--	2,778,457	1,102,591	640,688	1,035,178	--
Eastern Asia, total	3,147,384	8,747,056	49,400	25,348,727	8,192,780	7,817,781	9,300,381	37,785
China	234	34,273	--	49,516	11,021	3,148	35,346	--
Taiwan	264,039	434,975	--	1,664,981	681,057	620,496	363,428	--
Hong Kong	808,336	1,628,283	40,340	6,529,065	1,866,108	1,594,882	3,068,075	--
Japan	1,910,849	6,412,515	9,060	16,175,978	5,265,120	5,435,556	5,437,517	37,785
South Korea	163,927	237,009	--	929,188	369,475	163,699	396,014	--
Oceania, total	**523,674**	**2,994,663**	**340,842**	**8,373,162**	**2,219,947**	**2,262,190**	**3,870,136**	**20,889**
Australia	474,046	2,757,930	340,842	7,515,027	2,155,750	1,908,522	3,429,898	20,857
New Zealand	49,422	236,104	--	812,365	64,197	341,924	406,213	31
Puerto Rico and U.S. Possessions, total	**1,033,768**	**365,777**	**--**	**3,856,296**	**3,348,737**	**228,995**	**278,564**	**--**
Puerto Rico	189,494	224,967	--	406,928	96,679	101,902	208,347	--
U.S. Possessions, total	844,274	140,810	--	3,449,368	3,252,058	127,093	70,218	--
Guam	--	106,789	--	1,777,965	1,672,997	104,229	739	--
Virgin Islands	844,274	34,021	--	1,671,404	1,579,060	22,864	69,479	--
OPEC countries (included above)	**1,039,859**	**230,429**	**--**	**1,188,365**	**424,749**	**482,928**	**280,688**	**--**
Tax haven countries (included above)	**14,924,887**	**48,206,022**	**75,673**	**74,477,337**	**19,211,195**	**15,943,226**	**39,176,391**	**146,526**

[1] Number of returns is not additive because some U.S. corporations have Controlled Foreign Corporations in more than one country of incorporation.

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

Table 3.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Division of Controlled Foreign Corporation

[Money amounts are in thousands of dollars]

Selected country of incorporation and industrial division of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns [1]	7,500 largest Controlled Foreign Corporations				
		Number of foreign corporations	Total assets	Total receipts	Current earnings and profits (less deficit) before taxes	Income taxes
	(1)	(2)	(3)	(4)	(5)	(6)
ALL GEOGRAPHIC AREAS						
All industries [2]	**731**	**7,500**	**1,279,946,504**	**1,111,407,020**	**88,688,406**	**23,936,971**
Agriculture, forestry and fishing	11	24	904,681	1,235,959	55,778	20,169
Mining	61	169	43,592,296	34,180,335	8,020,321	2,590,935
Construction	20	82	5,881,690	8,753,248	690,872	182,549
Manufacturing	411	2,962	455,795,893	629,398,700	46,902,857	14,232,389
Transportation and public utilities	61	180	20,936,285	15,469,041	2,014,581	412,528
Wholesale and retail trade	246	1,164	132,321,382	300,300,337	14,579,667	3,770,549
Finance, insurance and real estate	472	2,234	574,031,383	91,576,941	13,817,418	1,923,074
Services	182	655	44,158,175	29,742,444	2,613,315	797,160
AUSTRALIA						
All industries [2]	**179**	**342**	**48,692,521**	**33,628,327**	**2,434,844**	**891,417**
Agriculture, forestry and fishing	**	**	**	**	**	**
Mining	7	10	1,712,197	723,316	161,706	3,596
Construction	4	5	347,899	473,889	-11,127	5,255
Manufacturing	97	127	13,306,678	17,872,895	1,685,134	668,331
Transportation and public utilities	4	8	363,594	226,963	20,870	3,512
Wholesale and retail trade	39	50	5,362,053	8,754,136	280,455	103,241
Finance, insurance and real estate	63	114	26,243,144	4,781,789	275,461	90,716
Services	18	23	1,192,301	759,267	16,893	15,382
BAHAMAS						
All industries [2]	**25**	**39**	**8,906,936**	**3,636,874**	**737,580**	**124,943**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	4	4	795,819	475,231	253,311	72,577
Construction	--	--	--	--	--	--
Manufacturing	3	3	665,427	1,001,638	52,422	10,223
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	5	8	597,207	619,514	164,106	40,738
Finance, insurance and real estate	13	19	5,534,278	461,685	52,365	-129
Services	**	**	**	**	**	**
BELGIUM						
All industries [2]	**133**	**224**	**32,780,563**	**26,376,146**	**2,347,287**	**406,600**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	**	**	**	**	**	**
Construction	**	**	**	**	**	**
Manufacturing	80	97	12,645,212	17,060,290	1,106,235	264,008
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	32	34	2,767,194	4,775,270	353,337	66,807
Finance, insurance and real estate	42	51	11,329,616	2,454,070	610,005	30,979
Services	29	34	5,252,967	1,639,911	247,015	37,659
BERMUDA						
All industries [2]	**147**	**226**	**29,760,630**	**18,771,947**	**2,310,727**	**112,702**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	6	10	899,899	1,053,372	162,519	48,978
Construction	--	--	--	--	--	--
Manufacturing	9	11	1,496,861	1,287,243	328,239	15,114
Transportation and public utilities	6	10	619,954	1,042,640	187,215	--
Wholesale and retail trade	11	12	2,631,889	10,131,313	278,990	13,045
Finance, insurance and real estate	131	173	23,209,520	5,091,461	1,335,597	34,126
Services	8	10	902,507	165,918	18,168	1,439

Footnotes at end of table.

Table 3.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Division of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and industrial division of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns [1]	7,500 largest Controlled Foreign Corporations				
		Number of foreign corporations	Total assets	Total receipts	Current earnings and profits (less deficit) before taxes	Income taxes
	(1)	(2)	(3)	(4)	(5)	(6)
BRAZIL						
All industries [2]	**135**	**259**	**28,532,012**	**37,814,102**	**3,403,598**	**1,000,180**
Agriculture, forestry and fishing	**	**	**	**	**	**
Mining	4	4	88,976	88,943	903	199
Construction	**	**	**	**	**	**
Manufacturing	100	134	17,691,019	21,731,952	2,295,278	589,122
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	19	29	2,971,122	7,894,140	429,756	127,157
Finance, insurance and real estate	42	66	5,662,689	5,164,206	380,404	85,243
Services	12	14	1,150,845	1,723,460	6,667	42,524
CANADA						
All industries [2]	**443**	**819**	**188,592,565**	**174,296,522**	**10,538,090**	**3,349,694**
Agriculture, forestry and fishing	**	**	**	**	**	**
Mining	34	41	16,502,989	15,341,691	1,298,102	470,227
Construction	8	10	685,572	1,167,865	152,725	13,888
Manufacturing	266	374	84,903,703	110,242,888	5,563,753	2,038,399
Transportation and public utilities	25	36	6,996,438	4,564,650	510,606	175,048
Wholesale and retail trade	94	108	13,656,493	28,888,753	742,120	226,591
Finance, insurance and real estate	113	186	60,887,952	10,524,506	2,006,514	321,940
Services	51	60	4,769,675	3,426,424	259,810	97,896
FRANCE (INCLUDING ANDORRA)						
All industries [2]	**239**	**504**	**65,695,198**	**83,505,632**	**4,930,243**	**1,565,191**
Agriculture, forestry and fishing	**	**	**	**	**	**
Mining	**	**	**	**	**	**
Construction	4	9	1,035,177	2,221,298	149,795	53,386
Manufacturing	150	275	37,274,199	53,688,928	3,601,662	1,095,513
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	68	88	9,998,268	20,863,823	755,646	285,093
Finance, insurance and real estate	58	79	13,986,321	3,001,428	125,479	18,784
Services	32	46	2,658,653	3,494,068	253,142	101,215
HONG KONG						
All industries [2]	**92**	**143**	**30,489,722**	**13,067,115**	**1,786,625**	**224,687**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	--	--	--	--	--	--
Construction	**	**	**	**	**	**
Manufacturing	26	30	1,490,940	3,509,258	248,225	30,224
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	33	33	2,520,858	5,415,411	456,586	40,243
Finance, insurance and real estate	31	57	23,055,912	2,764,246	653,118	124,925
Services	13	15	654,533	326,008	78,977	7,070
ITALY (INCLUDING SAN MARINO)						
All industries [2]	**197**	**368**	**51,132,195**	**56,707,179**	**4,728,502**	**1,457,936**
Agriculture, forestry and fishing	**	**	**	**	**	**
Mining	**	**	**	**	**	**
Construction	**	**	**	**	**	**
Manufacturing	123	198	30,849,632	39,949,656	2,891,332	1,047,258
Transportation and public utilities	4	6	217,368	203,584	-7,932	372
Wholesale and retail trade	63	75	6,112,546	12,847,889	1,440,319	239,540
Finance, insurance and real estate	36	52	12,026,586	1,863,467	212,956	87,777
Services	19	30	1,477,708	1,459,863	134,477	68,052

Footnotes at end of table.

Table 3.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Division of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and industrial division of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns [1]	7,500 largest Controlled Foreign Corporations				
		Number of foreign corporations	Total assets	Total receipts	Current earnings and profits (less deficit) before taxes	Income taxes
	(1)	(2)	(3)	(4)	(5)	(6)
JAPAN						
All industries [2]	**155**	**321**	**53,856,711**	**61,927,739**	**5,415,995**	**2,737,597**
Agriculture, forestry and fishing	**	**	**	**	**	**
Mining	--	--	--	--	--	--
Construction	**	**	**	**	**	**
Manufacturing	97	134	34,739,846	34,034,292	3,881,439	1,925,146
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	52	71	11,265,515	24,452,256	1,339,727	665,739
Finance, insurance and real estate	13	25	4,290,022	1,305,990	101,629	83,082
Services	16	86	3,158,754	1,180,816	73,330	51,477
MEXICO						
All industries [2]	**79**	**115**	**9,708,719**	**13,205,361**	**1,182,626**	**447,214**
Agriculture, forestry and fishing	**	**	**	**	**	**
Mining	**	**	**	**	**	**
Construction	**	**	**	**	**	**
Manufacturing	61	73	6,435,999	11,639,736	889,021	381,525
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	15	17	990,220	969,520	133,543	35,871
Finance, insurance and real estate	15	17	1,968,875	381,822	132,337	20,116
Services	4	4	113,575	64,416	11,298	4,079
NETHERLANDS						
All industries [2]	**189**	**397**	**76,012,583**	**57,378,078**	**7,507,404**	**1,464,125**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	5	5	3,986,660	3,281,584	1,898,464	572,946
Construction	3	3	108,987	234,879	26,793	5,210
Manufacturing	89	128	22,272,121	30,897,292	2,720,158	562,367
Transportation and public utilities	6	9	255,906	255,178	25,084	10,634
Wholesale and retail trade	48	58	6,249,190	15,037,001	664,880	167,072
Finance, insurance and real estate	101	157	39,606,202	5,086,130	1,726,752	76,965
Services	29	34	2,988,107	2,526,095	436,877	64,601
NETHERLANDS ANTILLES						
All industries [2]	**96**	**131**	**29,665,439**	**3,026,366**	**1,066,075**	**55,526**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	**	**	**	**	**	**
Construction	**	**	**	**	**	**
Manufacturing	**	**	**	**	**	**
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	**	**	**	**	**	**
Finance, insurance and real estate	88	122	28,599,772	2,734,564	1,062,300	52,510
Services	3	3	664,450	155,013	-21,226	1,144
PANAMA						
All industries [2]	**41**	**63**	**7,529,556**	**5,081,544**	**1,443,578**	**44,772**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	**	**	**	**	**	**
Construction	**	**	**	**	**	**
Manufacturing	9	11	2,898,853	2,027,783	374,879	21,211
Transportation and public utilities	5	9	995,107	656,389	43,105	957
Wholesale and retail trade	10	11	1,412,017	1,785,685	835,401	6,877
Finance, insurance and real estate	16	19	1,388,918	231,245	125,728	5,564
Services	5	6	482,257	229,639	37,318	7,056

Footnotes at end of table.

Table 3.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Division of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and industrial division of 7,500 largest Controlled Foreign Corporations	Number of U.S. corporation returns [1]	7,500 largest Controlled Foreign Corporations				
		Number of foreign corporations	Total assets	Total receipts	Current earnings and profits (less deficit) before taxes	Income taxes
	(1)	(2)	(3)	(4)	(5)	(6)
SPAIN						
All industries [2]	**146**	**223**	**27,132,141**	**26,057,936**	**2,481,620**	**774,539**
Agriculture, forestry and fishing	3	3	87,331	140,859	14,440	3,010
Mining	--	--	--	--	--	--
Construction	**	**	**	**	**	**
Manufacturing	95	121	14,272,069	18,970,959	1,923,268	585,273
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	36	39	2,669,128	4,179,691	303,989	100,987
Finance, insurance and real estate	22	30	8,503,661	1,690,058	85,737	40,553
Services	16	25	873,990	499,580	90,230	22,279
SWITZERLAND						
All industries [2]	**119**	**209**	**39,986,409**	**43,659,694**	**3,620,632**	**465,150**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	**	**	**	**	**	**
Construction	**	**	**	**	**	**
Manufacturing	34	45	5,935,859	6,817,365	1,163,222	179,575
Transportation and public utilities	3	3	249,800	106,002	45,867	2,799
Wholesale and retail trade	48	58	12,072,612	33,228,130	1,286,808	150,240
Finance, insurance and real estate	47	78	20,535,967	2,702,311	1,011,293	115,149
Services	14	18	864,774	557,717	107,366	15,625
UNITED KINGDOM						
All industries [2]	**408**	**1,257**	**298,694,741**	**189,762,719**	**11,766,192**	**3,263,307**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	23	36	10,147,855	7,387,210	2,439,235	618,875
Construction	10	15	1,181,191	1,703,178	112,828	33,623
Manufacturing	230	392	64,444,168	100,807,625	5,562,777	1,390,643
Transportation and public utilities	14	17	819,664	608,561	56,062	2,497
Wholesale and retail trade	86	116	22,459,686	45,175,164	1,893,595	763,508
Finance, insurance and real estate	201	549	189,908,137	27,517,269	1,399,423	333,647
Services	75	129	9,561,468	6,381,740	302,359	120,463
VENEZUELA						
All industries [2]	**33**	**43**	**1,838,202**	**2,076,053**	**138,030**	**52,650**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	**	**	**	**	**	**
Construction	--	--	--	--	--	--
Manufacturing	25	29	1,212,269	1,578,542	59,965	38,922
Transportation and public utilities	--	--	--	--	--	--
Wholesale and retail trade	6	6	367,497	384,011	42,990	3,348
Finance, insurance and real estate	**	**	**	**	**	**
Services	**	**	**	**	**	**
WEST GERMANY						
All industries [2]	**256**	**546**	**119,972,398**	**134,351,175**	**9,101,714**	**2,919,295**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	**	**	**	**	**	**
Construction	6	8	562,723	850,684	25,130	12,126
Manufacturing	153	264	56,249,592	95,091,834	6,415,639	2,270,019
Transportation and public utilities	6	7	735,334	1,098,506	-1,167	-2,976
Wholesale and retail trade	86	100	11,740,588	27,217,367	1,424,488	299,970
Finance, insurance and real estate	71	109	43,701,511	5,736,623	959,580	235,580
Services	33	53	3,889,912	3,333,457	274,368	103,194

Footnotes at end of table.

Table 3.–U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Division of Controlled Foreign Corporation–Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and industrial division of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations					
	Current earnings and profits (less deficit) after taxes	Foreign corporations with current earnings and profits (+) before taxes			Distributions from earnings and profits	Subpart F income
		Current earnings and profits before taxes	Income taxes	Current earnings and profits after taxes		
	(7)	(8)	(9)	(10)	(11)	(12)
ALL GEOGRAPHIC AREAS						
All industries [2]	**64,751,435**	**102,614,262**	**23,829,845**	**78,784,418**	**46,429,916**	**17,841,936**
Agriculture, forestry and fishing	35,609	70,567	18,672	51,895	16,436	1,589
Mining	5,429,386	8,346,795	2,594,259	5,752,535	4,139,635	992,587
Construction	508,323	760,337	187,099	573,237	203,822	43,975
Manufacturing	32,670,468	52,491,672	14,231,638	38,260,034	23,087,711	5,410,015
Transportation and public utilities	1,602,053	2,221,086	421,923	1,799,163	1,025,449	414,135
Wholesale and retail trade	10,809,118	15,985,128	3,702,845	12,282,283	6,434,300	3,208,595
Finance, insurance and real estate	11,894,343	19,329,044	1,885,259	17,443,785	10,518,766	7,341,297
Services	1,816,155	3,367,362	780,363	2,586,999	999,303	428,387
AUSTRALIA						
All industries [2]	**1,543,427**	**3,319,922**	**887,154**	**2,432,767**	**1,239,787**	**229,739**
Agriculture, forestry and fishing	**	**	**	**	**	**
Mining	158,110	174,535	2,796	171,740	4,901	9,913
Construction	-16,381	18,490	5,549	12,941	--	11,779
Manufacturing	1,016,804	1,878,417	671,540	1,206,877	767,566	67,842
Transportation and public utilities	17,358	28,804	3,526	25,278	2,341	557
Wholesale and retail trade	177,214	393,630	96,379	297,250	43,969	6,101
Finance, insurance and real estate	184,744	768,696	90,704	677,992	405,167	131,262
Services	1,511	50,857	15,278	35,579	14,812	2,283
BAHAMAS						
All industries [2]	**612,637**	**765,584**	**124,903**	**640,681**	**405,895**	**108,467**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	180,734	264,762	72,537	192,225	65,560	2,677
Construction	--	--	--	--	--	--
Manufacturing	42,199	60,365	10,223	50,142	9,998	11,625
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	123,367	164,106	40,738	123,367	129,055	17,534
Finance, insurance and real estate	52,494	60,975	-129	61,104	34,039	45,430
Services	**	**	**	**	**	**
BELGIUM						
All industries [2]	**1,940,687**	**2,487,988**	**407,320**	**2,080,668**	**1,484,727**	**916,158**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	**	**	**	**	**	**
Construction	**	**	**	**	**	**
Manufacturing	842,228	1,204,241	265,388	938,853	602,477	351,355
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	286,530	371,476	66,345	305,131	447,568	137,926
Finance, insurance and real estate	579,026	621,276	30,782	590,494	290,630	332,027
Services	209,356	253,113	37,194	215,919	142,338	75,893
BERMUDA						
All industries [2]	**2,198,025**	**2,519,598**	**112,434**	**2,407,164**	**1,540,191**	**1,687,581**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	113,541	221,610	48,827	172,783	135,950	62,437
Construction	--	--	--	--	--	--
Manufacturing	313,125	352,272	15,226	337,047	126,136	105,439
Transportation and public utilities	187,215	187,400	--	187,400	155,000	183,418
Wholesale and retail trade	265,945	284,690	13,045	271,645	89,258	68,077
Finance, insurance and real estate	1,301,470	1,449,602	33,928	1,415,674	1,028,733	1,249,031
Services	16,729	24,024	1,409	22,615	5,114	19,179

Footnotes at end of table.

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		Current earnings and profits before taxes	Income taxes	Current earnings and profits after taxes		
	(7)	(8)	(9)	(10)	(11)	(12)
BRAZIL						
All industries [2]	**2,403,418**	**4,068,360**	**917,664**	**3,150,695**	**812,999**	**352,552**
Agriculture, forestry and fishing	**	**	**	**	**	**
Mining	704	4,184	199	3,985	1,913	--
Construction	**	**	**	**	**	**
Manufacturing	1,706,156	2,708,758	557,762	2,150,996	605,403	98,463
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	302,599	509,240	101,719	407,521	43,383	132,960
Finance, insurance and real estate	295,161	480,526	72,714	407,812	98,148	95,324
Services	-35,857	63,420	25,727	37,694	30,291	25,193
CANADA						
All industries [2]	**7,188,395**	**12,062,627**	**3,408,701**	**8,653,926**	**5,950,116**	**1,293,543**
Agriculture, forestry and fishing	**	**	**	**	**	**
Mining	827,875	1,416,104	477,708	938,396	804,053	394,756
Construction	138,838	155,771	15,050	140,721	17,643	--
Manufacturing	3,525,354	6,377,425	2,064,196	4,313,229	3,388,925	190,146
Transportation and public utilities	335,558	542,862	175,661	367,201	75,123	7,741
Wholesale and retail trade	515,529	904,298	236,209	668,089	878,284	42,148
Finance, insurance and real estate	1,684,574	2,199,218	339,233	1,859,985	748,956	650,845
Services	161,914	454,508	94,940	359,567	30,144	7,907
FRANCE (INCLUDING ANDORRA)						
All industries [2]	**3,365,052**	**5,619,228**	**1,584,605**	**4,034,623**	**1,908,085**	**306,871**
Agriculture, forestry and fishing	**	**	**	**	**	**
Mining	**	**	**	**	**	**
Construction	96,409	150,665	53,386	97,279	68,588	--
Manufacturing	2,506,149	3,952,745	1,105,383	2,847,362	1,372,841	167,400
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	470,553	887,754	281,692	606,062	245,695	33,258
Finance, insurance and real estate	106,695	296,342	31,994	264,348	173,211	64,649
Services	151,926	280,962	100,954	180,008	42,322	41,564
HONG KONG						
All industries [2]	**1,561,938**	**1,859,514**	**224,316**	**1,635,199**	**1,023,116**	**535,454**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	--	--	--	--	--	--
Construction	**	**	**	**	**	**
Manufacturing	218,001	260,999	30,342	230,657	154,338	55,559
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	416,344	465,642	39,892	425,750	284,011	195,184
Finance, insurance and real estate	528,193	701,209	124,925	576,284	268,991	260,362
Services	71,907	81,441	7,070	74,371	69,818	19,816
ITALY (INCLUDING SAN MARINO)						
All industries [2]	**3,270,566**	**5,079,877**	**1,400,921**	**3,678,956**	**1,910,301**	**355,044**
Agriculture, forestry and fishing	**	**	**	**	**	**
Mining	**	**	**	**	**	**
Construction	**	**	**	**	**	**
Manufacturing	1,844,074	3,095,501	1,035,151	2,060,350	1,561,194	190,495
Transportation and public utilities	-8,303	12,401	--	12,401	--	--
Wholesale and retail trade	1,200,780	1,491,291	236,079	1,255,213	181,898	116,379
Finance, insurance and real estate	125,180	258,605	46,701	211,904	134,338	43,881
Services	66,425	164,730	68,052	96,678	25,467	3,311

Footnotes at end of table.

Table 3.–U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Division of Controlled Foreign Corporation–Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and industrial division of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations					
	Current earnings and profits (less deficit) after taxes	Foreign corporations with current earnings and profits (+) before taxes			Distributions from earnings and profits	Subpart F income
		Current earnings and profits before taxes	Income taxes	Current earnings and profits after taxes		
	(7)	(8)	(9)	(10)	(11)	(12)
JAPAN						
All industries [2]	**2,678,398**	**5,778,222**	**2,745,758**	**3,032,464**	**1,789,144**	**396,634**
Agriculture, forestry and fishing	**	**	**	**	**	**
Mining	--	--	--	--	--	--
Construction	**	**	**	**	**	**
Manufacturing	1,956,293	4,049,721	1,943,280	2,106,442	1,363,660	232,087
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	673,988	1,417,892	656,493	761,399	384,237	105,728
Finance, insurance and real estate	18,547	186,494	82,983	103,512	12,723	47,882
Services	21,853	102,143	51,104	51,039	24,509	10,937
MEXICO						
All industries [2]	**735,412**	**1,367,391**	**416,842**	**950,549**	**429,224**	**34,185**
Agriculture, forestry and fishing	**	**	**	**	**	**
Mining	**	**	**	**	**	**
Construction	**	**	**	**	**	**
Manufacturing	507,496	1,063,140	353,328	709,812	345,883	16,520
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	97,672	137,946	34,369	103,577	41,186	6,599
Finance, insurance and real estate	112,221	135,239	20,116	115,124	38,674	10,989
Services	7,218	13,044	4,079	8,964	--	78
NETHERLANDS						
All industries [2]	**6,043,279**	**7,705,763**	**1,462,018**	**6,243,745**	**3,631,195**	**1,030,278**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	1,325,518	1,900,955	573,739	1,327,216	1,233,262	7,608
Construction	21,583	26,793	5,210	21,583	20,471	--
Manufacturing	2,157,791	2,771,065	564,110	2,206,955	1,206,879	182,034
Transportation and public utilities	14,450	39,783	10,634	29,149	141,403	--
Wholesale and retail trade	497,808	687,493	167,022	520,470	277,716	117,640
Finance, insurance and real estate	1,649,787	1,793,826	76,216	1,717,610	682,224	667,402
Services	372,276	474,401	60,757	413,644	69,240	55,594
NETHERLANDS ANTILLES						
All industries [2]	**1,010,549**	**1,111,692**	**54,726**	**1,056,966**	**960,468**	**969,125**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	**	**	**	**	**	**
Construction	**	**	**	**	**	**
Manufacturing	**	**	**	**	**	**
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	**	**	**	**	**	**
Finance, insurance and real estate	1,009,790	1,070,108	52,256	1,017,852	877,343	889,046
Services	-22,370	5,325	657	4,668	5,829	4,668
PANAMA						
All industries [2]	**1,398,806**	**1,454,292**	**42,073**	**1,412,219**	**1,617,495**	**1,163,512**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	**	**	**	**	**	**
Construction	**	**	**	**	**	**
Manufacturing	353,667	379,316	21,316	358,000	245,170	251,962
Transportation and public utilities	42,148	43,105	957	42,148	4,130	25,269
Wholesale and retail trade	828,524	839,782	6,225	833,557	1,200,851	764,611
Finance, insurance and real estate	120,164	126,479	5,564	120,915	107,797	92,706
Services	30,262	37,654	7,056	30,598	54,929	5,685

Footnotes at end of table.

Table 3.--U.S. Corporations with Total Assets of $500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Total Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and Industrial Division of Controlled Foreign Corporation--Continued

[Money amounts are in thousands of dollars]

Selected country of incorporation and industrial division of 7,500 largest Controlled Foreign Corporations	7,500 largest Controlled Foreign Corporations					
	Current earnings and profits (less deficit) after taxes	Foreign corporations with current earnings and profits (+) before taxes			Distributions from earnings and profits	Subpart F income
		Current earnings and profits before taxes	Income taxes	Current earnings and profits after taxes		
	(7)	(8)	(9)	(10)	(11)	(12)
SPAIN						
All industries [2]	**1,707,081**	**2,800,062**	**774,280**	**2,025,782**	**661,366**	**794,960**
Agriculture, forestry and fishing	11,431	14,440	3,010	11,431	1,786	--
Mining	--	--	--	--	--	--
Construction	**	**	**	**	**	**
Manufacturing	1,337,995	2,123,888	587,363	1,536,525	492,296	707,965
Transportation and public utilities	**	**	**	**	**	**
Wholesale and retail trade	203,001	340,804	98,455	242,348	94,170	6,617
Finance, insurance and real estate	45,184	140,573	40,035	100,537	7,677	71,825
Services	67,950	93,032	22,979	70,052	25,769	8,554
SWITZERLAND						
All industries [2]	**3,155,482**	**3,782,253**	**459,788**	**3,322,464**	**1,962,213**	**1,357,328**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	**	**	**	**	**	**
Construction	**	**	**	**	**	**
Manufacturing	983,647	1,164,642	179,556	985,086	499,801	188,024
Transportation and public utilities	43,069	45,867	2,799	43,069	31,999	35,326
Wholesale and retail trade	1,136,569	1,298,297	150,180	1,148,117	489,475	440,839
Finance, insurance and real estate	896,144	1,121,223	110,289	1,010,934	848,236	648,937
Services	91,741	112,062	15,202	96,860	89,158	44,202
UNITED KINGDOM						
All industries [2]	**8,502,885**	**17,232,427**	**3,278,828**	**13,953,599**	**9,146,682**	**2,196,112**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	1,820,360	2,456,761	618,073	1,838,688	1,182,981	471,326
Construction	79,206	119,851	37,045	82,806	11,927	8,317
Manufacturing	4,172,134	6,881,133	1,401,995	5,479,138	3,647,976	465,206
Transportation and public utilities	53,566	74,789	5,063	69,726	36,169	5,415
Wholesale and retail trade	1,130,087	2,250,710	749,139	1,501,570	631,796	408,900
Finance, insurance and real estate	1,065,775	4,912,067	338,073	4,573,994	3,453,892	811,717
Services	181,896	536,483	129,387	407,096	181,942	25,230
VENEZUELA						
All industries [2]	**85,380**	**230,728**	**51,365**	**179,363**	**13,948**	**12,257**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	**	**	**	**	**	**
Construction	--	--	--	--	--	--
Manufacturing	21,043	146,055	38,687	107,369	12,454	7,349
Transportation and public utilities	--	--	--	--	--	--
Wholesale and retail trade	39,642	47,051	3,126	43,925	1,493	2,488
Finance, insurance and real estate	**	**	**	**	**	**
Services	**	**	**	**	**	**
WEST GERMANY						
All industries [2]	**6,182,419**	**9,775,916**	**2,913,065**	**6,862,852**	**4,212,611**	**1,970,799**
Agriculture, forestry and fishing	--	--	--	--	--	--
Mining	**	**	**	**	**	**
Construction	13,004	35,790	12,126	23,664	14,308	--
Manufacturing	4,145,620	6,604,623	2,274,654	4,329,969	3,407,026	1,391,978
Transportation and public utilities	1,809	3,636	--	3,636	--	--
Wholesale and retail trade	1,124,518	1,587,801	292,011	1,295,791	282,886	126,912
Finance, insurance and real estate	724,000	1,232,565	229,339	1,003,226	439,755	427,143
Services	171,174	307,643	103,383	204,260	68,637	24,767

[1] Number of returns is not additive because some U.S. corporations have Controlled Foreign Corporations in more than one industrial division and more than one country of incorporation.

[2] Includes "Nature of business not allocable," which is not shown separately.

**Not shown to avoid disclosure of information about specific corporations. However, the data are included in the appropriate totals.

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