

Corporate Foreign Tax Credit, 1998

by Rob Singmaster and Andrea Heilbrunner

For 1998, U.S. corporations claimed foreign tax credits totaling \$37.3 billion (after limitations). The 5,927 companies claiming these credits earned \$147.1 billion in foreign-source “taxable income” and paid \$47.6 billion in income taxes to foreign governments. Under the foreign tax credit provisions of the Internal Revenue Code, these corporations were able to lower their U.S. income tax liability from \$132.7 billion (U.S. income tax before credits) to 95.4 billion, a 28.1-percent reduction. Other credits, including the U.S. possessions tax credit and the general business tax credit, further reduced their US tax liability to \$88.7 billion. The \$37.3-billion foreign tax credit for 1998 represents a \$4.9-billion decrease from 1997.

U.S. corporations claiming a foreign tax credit reported worldwide taxable income (comprised of both U.S. and foreign-source income) totaling \$377.1 billion, 39 percent of which was from foreign sources. The United Kingdom, Canada, Germany, Japan, and the Netherlands were the top five leading sources of foreign income for U.S. corporations that claimed a foreign tax credit. These countries, with \$64.6 billion, accounted for 43.9 percent of the year’s foreign-source income. The United Kingdom, with \$22.2 billion, was the largest source, followed by Canada, with \$13.4 billion.

Background

Starting with 1913, the first year of the modern U.S. income tax, U.S. taxpayers have been subject to taxation of their worldwide incomes. U.S. corporations with international operations or investments may also be taxed on their foreign-source incomes in the country in which the income is earned. This results in double taxation, whereby income earned overseas is taxed first by a foreign government and then again by the United States. To help alleviate this double taxation, the United States adopted foreign tax credit provisions starting with the Revenue Act of 1918. The foreign tax credit allows U.S. corporations to offset the U.S. tax on their foreign-source “taxable income” with a credit for the foreign taxes that were already paid.

Since their inception, the foreign tax credit’s provisions have been modified numerous times. The original foreign tax credit introduced for 1918 allowed taxpayers an unlimited credit against U.S. income taxes for any taxes paid to or accrued in a foreign country or U.S. possession. Therefore, in cases where the foreign tax rate was higher than the tax rate in the United States, part of the U.S. tax on domestic earned income was offset by the credit for taxes paid to a foreign jurisdiction. This resulted in an unintended loss of tax revenue on domestic income and led to the development of a foreign tax credit limitation.

The Revenue Act of 1921 helped to alleviate this problem by introducing an “overall limitation” which restricted the foreign tax credit to the lesser of: 1) the U.S. income tax multiplied by the ratio of foreign-source taxable income to worldwide taxable income, or 2) the actual foreign taxes paid. The limitation effectively placed a ceiling, equivalent to the U.S. tax on foreign-source income, on the amount of taxes that a corporation could credit.

The overall limitation restricted the aggregate tax credit, but corporations were still free to arrange their overseas business activities so as to maximize their credits. Specifically, corporations with operations or investments in foreign jurisdictions whose tax rate was higher than the U.S. tax rate could offset what would otherwise be excess credits by investing in low tax jurisdictions. In this way, corporations were blending credits from high- and low-taxed countries to maximize their overall credit amounts. To prevent this, Congress enacted a “per-country” limitation, which required taxpayers to calculate a foreign tax credit limitation on a country-by-country basis. The per-country limitation was used in various forms from 1932 through 1976.

Prior to 1962, corporations were allowed to combine all types of foreign-source income when computing their foreign tax credit limitations. However, with the passage of the Revenue Act of 1962, corporations were required to compute a separate limitation for non-business related interest income. The intent was to prevent corporations with foreign-source income from business operations that were taxed at rates higher than the U.S. rate, from making interest-bearing investments abroad to generate additional foreign income that was subject to little or no foreign tax. This additional lower-taxed, foreign

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interest income, combined with the higher-taxed, other foreign income, enabled corporations to increase the foreign tax credit limitation. By separating low-taxed non-business income from higher-taxed business income, U.S. corporations were limited in their ability to arrange foreign investments at the expense of U.S. taxation.

Since 1962, the number of separate income categories has increased, especially as a result of the Tax Reform Act of 1986. The current structure of statutory categories for foreign source income requires separate treatment for different types of income and for income from different industrial activities.

For 1998, taxpayers were required to compute a separate foreign tax credit limitation for each of the following income categories or “baskets” (these statutory categories are defined in the Explanation of Selected Terms section):

- * Passive income,
- * High withholding tax interest,
- * Financial services income,
- * Shipping income,
- * Income re-sourced by treaty,
- * Dividends from each “noncontrolled” foreign corporation as defined in Internal Revenue Code section 902,
- * Dividends from an Interest-Charge Domestic International Sales Corporation (IC-DISC) or former DISC,
- * Certain distributions from a Foreign Sales Corporation (FSC) or Former FSC [1],
- * Taxable income attributable to foreign trade income,
- * Income from sanctioned countries, per Internal Revenue Code section 901(j) [2], and
- * All other income from outside the United States (commonly referred to as general limitation or overall “basket” income).

Rules regarding excess or unused credits have varied over time. While different regulations were used prior to 1958, the Technical Amendments Act of 1958 introduced the carryover and carryback of “unused” foreign taxes. The act specified that any taxes that exceeded the current-year limitation (and that could, therefore, not be used) could be carried back 2 years to be retroactively applied (necessitating an amended return or possibly a claim for a refund) or carried forward 5 years, subject to the current-

year foreign tax credit limitation for each year. As a result of this act, the total foreign taxes for each separate limitation category for any given year include current-year foreign taxes plus taxes carried forward from previous years. (The foreign taxes available for the credit shown in this article include only current-year taxes and those carried forward to 1998 from previous years; no taxes carried back to 1998 are included in the statistics. Amended returns are not included in the data as they were (or will be) filed after the data were collected.)

Foreign Tax Credit

To claim a foreign tax credit, a U.S. corporation must have foreign-source income, pay foreign income tax on that income, and have a U.S. income tax liability. The foreign tax credit is elective; if the taxpayer elects to take the credit, then no deduction for those foreign taxes is available. Most taxpayers elect to take the credit, since it offsets the U.S. income tax dollar for dollar, rather than a deduction, which may only offset every dollar of U.S. tax by the percentage of the tax rate.

Between 1993 and 1998, the number of U.S. corporations electing to credit foreign taxes varied from year to year, with 1998 showing the lowest number (Figure A). For 1998, there were 5,927 corporations that chose to credit their taxes, down from 6,569 the previous year [3]. However, since 1991, the foreign tax credit rose, despite the reduction in the number of corporations that claimed it. Tax Year 1998 was the first year since 1991 when the foreign tax credit, along with worldwide taxable income, U.S. income tax before credits, and foreign-source taxable income all fell. While the number of returns with a foreign tax credit dropped 9.8 percent between 1997 and 1998, worldwide taxable income fell by 8 percent. Additionally, the U.S. income tax before credits fell 8.3 percent, from \$144.8 billion for 1997 to \$132.7 billion for 1998, and foreign-source taxable income fell 6.9 percent, from \$158 billion for 1997 to \$147.1 billion for 1998. During this same time period, current-year foreign taxes actually rose, by 5.5 percent, from \$45.1 billion to \$47.6 billion, but the amount of foreign tax credit claimed fell 11.6 percent. However, the decreases for 1998 are compared to 1997 numbers, which represented record highs. Overall, the 1998 decreases were more in line with 1996. Worldwide income, while 8

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Figure A

Income Subject to U.S. Tax, Foreign-Source Taxable Income, Current-Year Foreign Taxes, and Foreign Tax Credit, Tax Years 1993-1998

[Money amounts are in millions of dollars]

Tax year	Number of U.S. corporation returns	Income subject to U.S. tax ¹	U.S. income tax before credits		Foreign-source taxable income (less loss) ²		Current-year foreign taxes		Foreign tax credit claimed	
			Amount	As a percentage of income subject to U.S. tax	Amount	As a percentage of income subject to U.S. tax	Amount	As a percentage of foreign-source taxable income ³	Amount	As a percentage of U.S. income tax before credits
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
1993.....	6,322	228,688	81,913	35.8	94,687	41.4	23,716	25.0	22,895	28.0
1994.....	7,199	255,439	90,786	35.5	101,521	39.7	26,470	26.1	25,419	28.0
1995.....	6,710	303,308	107,996	35.6	120,518	39.7	30,930	25.7	30,416	28.2
1996.....	6,100	370,049	130,748	35.3	150,826	40.8	41,177	27.3	40,255	30.8
1997.....	6,569	410,126	144,779	35.3	157,989	38.5	45,080	28.5	42,223	29.2
1998.....	5,927	377,129	132,740	35.2	147,129	35.9	47,576	32.3	37,338	28.1

¹ "Worldwide taxable income" is also used to describe "income subject to U.S. tax"

² Before adjustments.

³ The percentages shown in this column are not effective tax rates. An effective tax rate would contain a measure of economic income in the denominator and taxes on that income in the numerator. The percentages shown here are simply a tool used to determine what factors contributed to the relatively constant proportion of foreign tax credits to U.S. tax liability over the 1993-1998 period.

percent less than for 1997, was still 2 percent more than for 1996, and U.S. income tax before credits was 1.5 percent more than for 1996. Foreign-source taxable income for 1998 was 2.5 percent less than 1996, while the 1998 foreign tax credit was 7.2 percent less than for 1996.

Separate Limitation Categories, Tax Year 1998

As a result of the Revenue Act of 1962 and the Tax Reform Act of 1986, U.S. corporations are required to compute a separate foreign tax credit limitation for each apportioned statutory income category or "basket." Of the \$147.1 billion of foreign-source taxable income reported, income classified in the general limitation basket accounted for the largest amount, with \$108.7 billion, or about 74 percent of the total (Figure B). Not surprisingly, \$38.8 billion, or around 82 percent, of the total current-year foreign taxes were paid on this income.

Financial services income was the second largest income basket and accounted for 19.1 percent of foreign-sourced taxable income. Around \$6 billion, or 13 percent, of the current-year foreign taxes were paid on this income.

Current-year foreign taxes as a percentage of foreign-source taxable income vary according to the income category [4]. At 35.7 percent, general limita-

tion income generated the largest percentage of current-year foreign taxes. Overall, current-year taxes as a percentage of foreign-source taxable income was 32.3 percent. However, shipping income and passive income, two of the statutory groups designed to isolate lower-tax income, were significantly less, 16.2 and 12.1 percent, respectively.

Geographic Focus

Continuing a multiyear trend, U.S. corporations with business holdings in European countries were responsible for a significant amount of foreign-source gross and taxable income (Figure C, D, and Table 3) for 1998. Europe reported a total of \$66.2 billion (45.0 percent) in taxable income, of which the European Union (EU) accounted for \$60.6 billion. The next two largest regions combined, Asia and Latin America, accounted for \$38.7 billion, equal to 63.9 percent of the European Union's foreign-source taxable income total.

As with previous years, the data indicate that a small number of countries accounted for a large portion of the foreign-source taxable income reported by U.S. corporations (Figure C). The United Kingdom, Germany, the Netherlands, Japan, and Canada accounted for \$64.7 billion, or 43.9 percent. The United Kingdom, alone, accounted for almost as

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Figure B

Foreign-Source Taxable Income, Current-Year Foreign Taxes, and Carryover, by Selected Separate Limitation Category, Tax Year 1998

[Money amounts are in thousands of dollars]

Selected limitation category	Foreign-source taxable income (less loss) ¹	Current-year foreign taxes	Current-year foreign taxes as a percentage of foreign-source taxable income ²	Carryover from prior years
	(1)	(2)	(3)	(4)
All separate limitation categories ³	147,116,869	47,575,987	32.3	9,368,659
Passive income.....	5,567,513	674,146	12.1	43,399
High withholding tax interest.....	1,465,100	423,071	28.9	85,551
Financial services income.....	28,048,630	6,015,291	21.4	225,381
Shipping income.....	835,349	134,982	16.2	9,389
General limitation income.....	108,672,198	38,804,728	35.7	8,495,176

¹ Before adjustments.

² The percentages shown in this column are not effective tax rates. An effective tax rate would contain a measure of economic income in the denominator and tax on that income in the numerator.

³ Sum of detail does not equal total for these columns because only selected categories are shown.

much foreign-source taxable income (\$22.2 billion, or 15.1 percent) as the entire Asian continent (\$23.4 billion, or 15.9 percent).

Foreign tax paid or accrued and taxes “deemed paid” (see Explanation of Selected Terms, under *Gross-up*) figures, the two parts of total foreign taxes, are presented by region in Figure E. Countries in the European Union were the largest recipients of

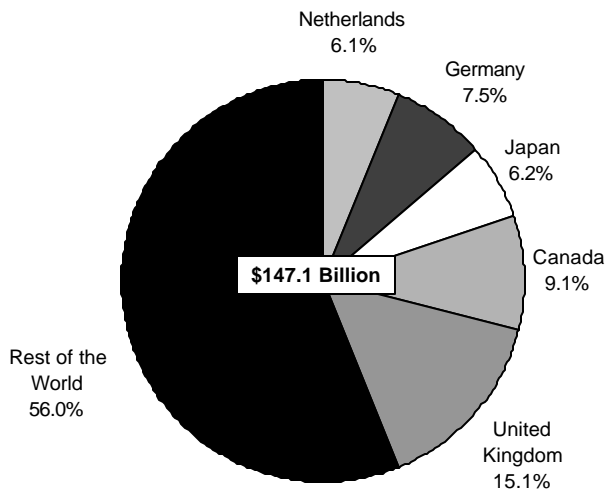
foreign taxes paid, accrued, or deemed paid by U.S. corporations, reporting a combined \$18.5 billion, or 45.5 percent. The vast majority of these taxes were those deemed paid (79.5 percent). Asia, the next largest recipient of foreign taxes, accounted for an amount equal to about two-fifths of the European Union total, with \$7.7 billion, though their taxes paid or accrued were roughly equivalent to those of the European Union. As with foreign-source taxable income, the United Kingdom, Germany, the Netherlands, Japan, and Canada led all other countries in terms of foreign tax paid, accrued, or deemed paid. These countries accounted for a combined \$20.8 billion, or 51.1 percent, of the total foreign tax figure. As with foreign-source taxable income, the United Kingdom accounted for more of the combined taxes than any other country, with \$6.1 billion, or 15.0 percent, of the total.

Oil and Gas Extraction Income

Oil and gas extraction income, deductions, and taxes are reported separately from other types of foreign-source income by U.S. corporations claiming a foreign tax credit related to that income [5]. Internal Revenue Code section 907 outlines the separate rules pertaining to oil and gas extraction income and how they affect the foreign taxes a corporation can credit. These rules prohibit certain foreign taxes from being credited and call for another limitation calculation specific to foreign oil and gas extraction income (FOGEI). Foreign taxes are excluded from the

Figure C

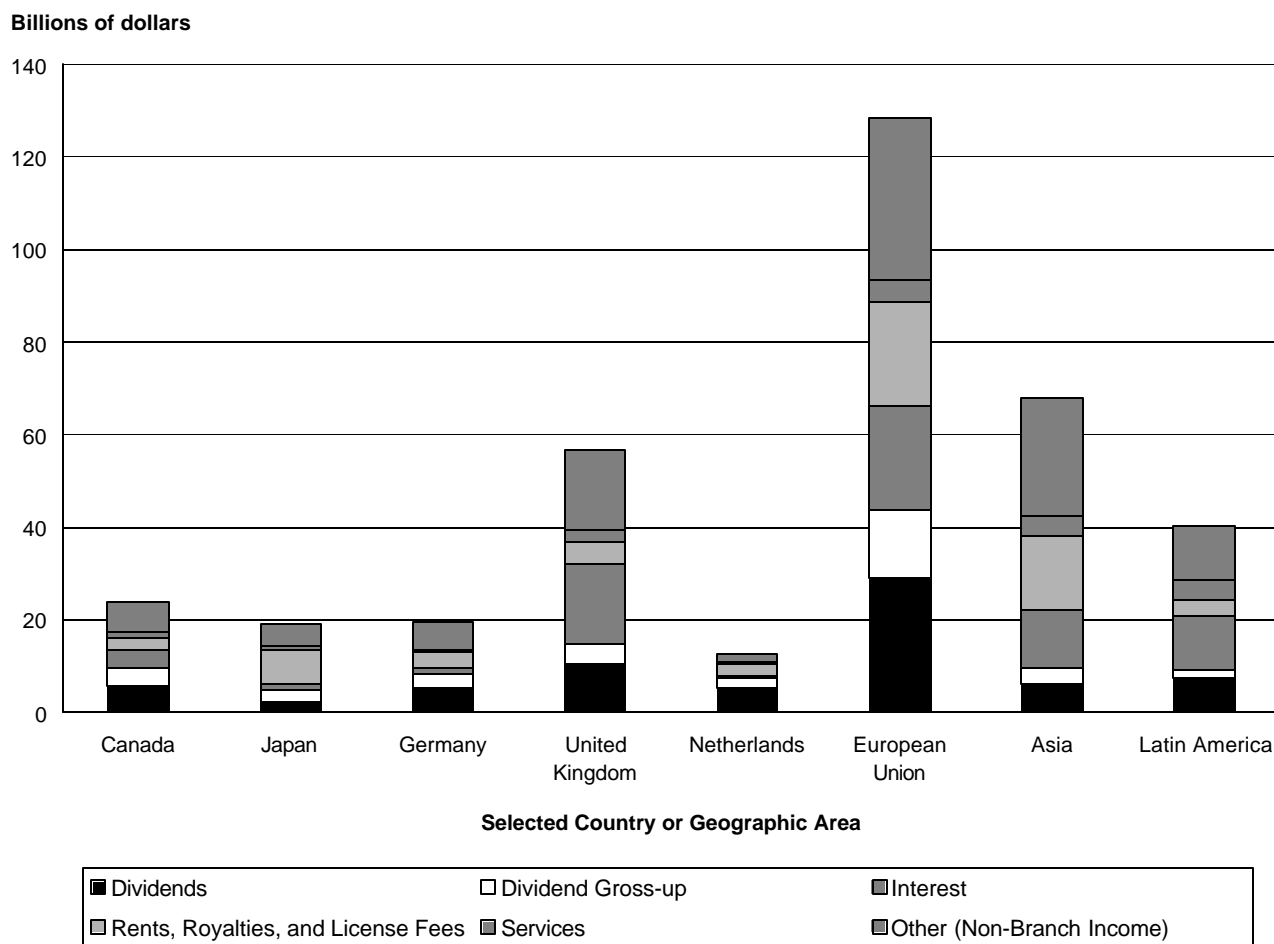
Percentage of Foreign-Source Taxable Income (less Loss), by Selected Country or Geographic Area, Tax Year 1998



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Figure D

Foreign-Source Gross Income (Excluding Branch Income), by Type and by Selected Country or Geographic Area, Tax Year 1998



calculation if they were paid, accrued, or deemed paid at a rate in excess of the applicable U.S. tax rate. The law allows that only foreign income taxes, as viewed through U.S. tax principles, are creditable. Credits can be denied for foreign levies that are found to, in effect, constitute royalty payments to a foreign government. Also excluded are voluntary payments in lieu of taxes, and payments for specific rights (such as the right to extract a natural resource) or services.

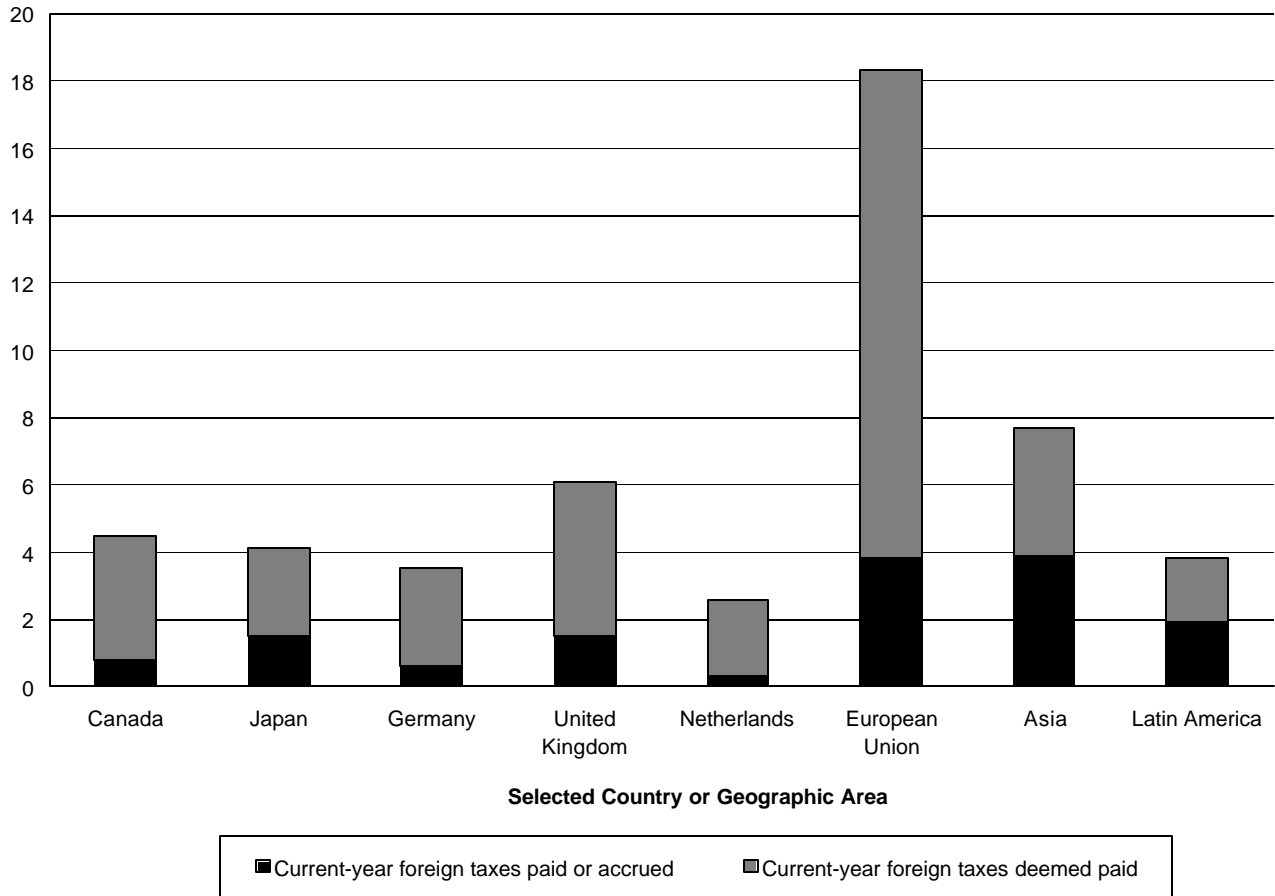
Figure F shows foreign oil and gas extraction income (FOGEI) by both selected industry groups and selected countries for 1998. A significant portion (86.9 percent) of FOGEI was reported by U.S.

corporations classified as refiners of petroleum (including integrated) and coal products manufacturing. For 1998, the oil and gas extraction industry group accounted for only 2.4 percent of the total oil and gas extraction-related gross income reported. Figure F lists the countries generating the greatest amounts of gross income associated with foreign oil and gas extraction. For the fifth straight year, U.S. corporations reported the United Kingdom as the largest source of FOGEI. Norway and Indonesia were responsible for the next highest gross income figures, each representing approximately 6 percent and 4 percent of total FOGEI, respectively. Eight countries, the United Kingdom, Norway, Indonesia, Aus-

Figure E

Foreign Taxes Paid or Accrued and Foreign Taxes Deemed Paid, by Selected Country or Geographic Area, Tax Year 1998

Billions of dollars



tralia, the Netherlands, Canada, Trinidad and Tobago, and Egypt accounted for a combined 58.9 percent of all gross income from foreign oil and gas extraction activities.

Industrial Groupings Under the North American Industry Classification System

The North American Industry Classification System (NAICS) was created under the auspices of the governments of the United States, Mexico, and Canada in response to the North American Free Trade Agreement (NAFTA). It was created in order to standardize business categories, as well as to better describe the types of businesses in each

nation's economy [6]. NAICS organizes economic units by similar production processes (a production-oriented system), while the formerly used Standard Industrial Classification (SIC) organized economic units by their end products (a product-oriented system). One of the most notable differences between the NAICS and SIC systems is that NAICS puts a greater emphasis on separately identifying service industries. This new feature was added in response to the growing importance to the U.S. economy of technology-based services versus manufacturing.

Tax Year 1998 was the first year that U.S. corporations used NAICS on tax returns to classify

Figure F

U.S. Corporation Returns with a Foreign Tax Credit: Foreign Oil and Gas Extraction Gross Income by Selected Industrial Group and Selected Country, Tax Year 1998

[Money amounts are in millions of dollars]

Selected industrial group, country	Gross income (less loss)	Percentage of total
Selected industrial group:		
All industries.....	15,127	100.0
Petroleum (including integrated) and coal products manufacturing.....	13,144	86.9
Chemical manufacturing.....	1,469	9.7
Oil and gas extraction.....	358	2.4
All other industries.....	156	1.0
Selected country:		
All countries.....	15,127	100.0
United Kingdom.....	4,705	31.1
Norway.....	768	5.1
Indonesia.....	757	5.0
Australia.....	717	4.7
Netherlands.....	637	4.2
Canada.....	*517	*3.4
Trinidad and Tobago.....	*405	*2.7
Egypt.....	*401	*2.7
Malaysia.....	*338	*2.2
Saudi Arabia.....	*330	*2.2
Nigeria.....	*201	*1.3
Columbia.....	*189	*1.2
Denmark.....	*178	*1.2
All other countries.....	4,984	33.0

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

their primary business activities. Consequently, this was the first year that Statistics of Income (SOI) began classifying data according to NAICS. Data compiled using the NAICS system are shown in Figure G and in Tables 1a, 2, and 3. The data based on the previously used SIC system are also presented in Figure G and in Table 1b. Data at the SIC division and major group levels were based on the conversion of Tax Year 1998 data from NAICS-based industry codes to SIC-based codes and, therefore, will not coincide with the industry totals in Table 1a.

The NAICS system as adapted for Statistics of Income consists of nine so called “divisions,” comprising aggregates of NAICS sector data: raw materials and energy production; goods production; distribution and transportation of goods; information; finance, insurance, real estate, and rental and leasing; professional and business services; education, health, and social assistance; leisure, accommodation, and

food services; and other services. These divisions were created as an aggregated structure for use by statistical agencies in the United States in order to allow comparability of statistics across agencies and are employed for the purposes of this article. The aggregation of NAICS sectors into divisions can be seen in Figure G and Table 1a. Figure G shows the number of corporation income tax returns claiming a foreign tax credit and total foreign tax credit claimed for both the NAICS-based industry groupings and the SIC-based industry groupings, according to the NAICS-based equivalents.

Industry Composition

Even with changes in industrial classification, manufacturing corporations in 1998 continued to account for the majority of foreign-source taxable income, current-year taxes, and foreign tax credits. U.S. manufacturers were responsible for \$91.6 billion, or 62.3 percent, of the foreign-source taxable income and \$38.1 billion, or 80 percent, of the current-year foreign taxes. As a result, U.S. manufacturers were able to claim \$26.7 billion, or 71.6 percent, of the total foreign tax credits. Within manufacturing, the most significant of the specific industry sectors in terms of foreign-source taxable income, current-year foreign taxes, and foreign tax credit claimed was computer and electronic products, a new sector created under the NAICS system. This is a change from previous years when petroleum and coal products manufacturing accounted for the majority of these amounts, and technology-related services and manufacturing were distributed among several industry groups. While the manufacture of petroleum and coal products continued to make up 11.4 percent of the total foreign tax credit claimed for 1998, computer and electronic products manufacturing contributed 14.8 percent.

The other significant change in industry composition also resulted from the new NAICS classifications. For 1997, using the SIC classification system, finance, insurance, and real estate corporations accounted for the second largest source of total foreign-source taxable income and foreign taxes, while services were a smaller proportion. However, under the NAICS classification system, income and taxes related to bank holding companies were classified for Statistics of Income under the services division as the subsector “management of companies

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Figure G

Comparison of the Number of Returns with a Foreign Tax Credit and Total Foreign Tax Credit, by Standard Industrial Classification (SIC) System and North American Industry Classification System (NAICS) Industry Groupings, by NAICS Division, Tax Year 1998

[Money amounts are in thousands of dollars]

NAICS Division, selected industrial sector, or group	Number of returns		Percentage difference between NAICS/SIC	Total foreign tax credit		Percentage difference between NAICS/SIC
	SIC	NAICS		SIC	NAICS	
	(1)	(2)	(3)	(4)	(5)	(6)
All industries	5,927	5,927	--	37,338,380	37,338,380	--
Raw material and energy production	310	204	-34.2	1,194,675	1,085,685	-9.1
Agriculture, forestry, fishing, and hunting.....	107	81	-24.3	52,931	54,317	2.6
Mining.....	164	101	-38.4	504,285	501,907	-1.0
Utilities.....	39	23	-41.0	637,459	529,461	-16.9
Goods production	1,854	1,731	-6.6	27,242,346	26,787,750	-1.7
Construction.....	220	221	0.5	70,498	49,696	-29.5
Manufacturing.....	1,634	1,510	-7.6	27,171,848	26,738,054	-1.6
Distribution and transportation of goods	868	896	3.2	1,425,156	1,183,441	-17.0
Wholesale and retail trade.....	782	809	3.5	1,276,965	1,033,628	-19.1
Wholesale trade.....	513	621	21.1	537,639	574,516	6.9
Retail trade.....	270	187	-30.7	739,326	459,112	-37.9
Transportation and warehousing.....	86	87	1.2	148,191	149,813	1.1
Information ¹	32	161	403.1	411,647	1,608,877	290.8
Finance, insurance, real estate, and rental and leasing	1,724	1,490	-13.6	5,581,569	3,065,854	-45.1
Finance and insurance.....	1,358	1,204	-11.3	5,562,559	3,053,584	-45.1
Real estate and rental and leasing.....	362	286	-21.0	17,341	12,270	-29.2
Service	1,133	1,435	26.7	1,470,371	3,571,425	142.9
Professional and business services.....	274	1,184	332.1	1,112,055	2,921,224	162.7
Professional, scientific, and technical services.....	274	459	67.5	1,112,055	397,237	-64.3
Management of companies (holding companies) ²	--	725	100.0	--	2,523,987	100.0
Education, health, and social assistance.....	11	38	245.5	21,441	24,367	13.6
Health care and social assistance.....	11	38	245.5	21,441	24,367	13.6
Leisure, accommodation, and food services.....	153	83	-45.8	211,818	464,525	119.3
Arts, entertainment, and recreation.....	140	15	-89.3	171,511	55,543	-67.6
Accommodation and food services.....	13	68	423.1	40,307	408,982	914.7
Other services.....	686	130	-81.0	123,331	161,309	30.7
Not allocable	6	10	66.7	12,616	35,348	180.2

¹ The Communications group under the former Standard Industrial Classification System (SIC) is classified in the Information Sector under the North American Industrial Classification System (NAICS).

² Management of companies, specifically bank holding companies, is included in the finance and insurance sector under the former Standard Industrial Classification System (SIC).

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

(holding companies).” As a result, the service division now represented a much larger proportion of total foreign-source taxable income and current-year foreign taxes for 1998 than for 1997. For 1998, the service division accounted for around 10 percent of total foreign-source taxable income, foreign taxes, and foreign tax credits. For 1997, it accounted for only around 5 percent. Finance, insurance, and real estate, which accounted for 14.5 percent of foreign-source taxable income and 15.8 percent of the total foreign tax credit in 1997 under SIC, accounted for only 7 percent and 8.2 percent in 1998 under NAICS, respectively. This decrease occurred de-

spite the addition of rental and leasing to this division under NAICS.

Summary

U.S. corporations claimed a total foreign tax credit of \$37.3 billion for 1998, an 11.6-percent decrease from the previous year. This was caused by a decrease in foreign-source income and related foreign taxes paid, accrued, or deemed paid across most industrial groupings and countries. As in previous years, Europe, especially members of the European Union, was responsible for the most foreign-source taxable income and foreign taxes paid, accrued, or deemed

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paid. Corporations classified under finance, insurance, real estate, and rental and leasing continue to account for a larger share of the foreign income and foreign tax credit totals, a trend that became evident during the 1990's.

Tax Year 1998 was the first year U.S. corporations used the North American Industry Classification System (NAICS) to define their principal business activities. This new system will allow a more thorough analysis of the service and technical industries in the coming years. Comparison of 1998 to 1997 data based on the former Standard Industrial Classification (SIC) system allows for analysis of industry-level changes between these 2 tax years.

Data Sources and Limitations

The statistics in this article were derived from corporation income tax returns with a foreign tax credit that were included in the 1998 Statistics of Income sample of returns with accounting periods ending between July 1998 and June 1999. These returns were selected after administrative processing but prior to any amendments or audit examination. The 1998 corporation income tax return sample included approximately 94,000 returns sampled from over 4.8 million returns filed for this period.

The foreign tax credit is claimed under section 901 of the Internal Revenue Code. Corporations report the foreign income and taxes related to the credit on Form 1118, *Computation of Foreign Tax Credit--Corporations*, filed with their income tax returns. The statistics in this article are based on information reported on Forms 1118 and related corporate returns. 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 article, 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 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 article and those published in *Statistics of Income--1998, Corporation Income Tax Returns* [7]. One reason for this difference is that a few 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 article. Additionally, certain corporations submitted preliminary data on their original returns, since 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. Amended returns filed at a later date, including those with carrybacks of foreign taxes to be credited for 1998, were not available for these statistics.

Foreign income and taxes are understated in this article to the extent that they either were not or did not have to be reported on Form 1118. Taking into account carryback provisions, the 1998 foreign tax credit statistics in this article do not represent the final amounts credited that year. A complete foreign tax credit amount would reflect the results of any audits, as well as the carryback of some foreign taxes from 1999 and 2000. Foreign taxes available for credit in this article include only those carried forward to 1998 from previous years. Some corporations also 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 1998. Finally, other corporations could have deducted their foreign taxes from their gross incomes versus claiming a foreign tax credit.

Since the estimates are based on a sample, they are subject to sampling error. Coefficients of variation (CV's) are used to measure the magnitude of this sampling error. The CV is defined in the section on sampling variability in the "SOI Sampling Methodology and Data Limitations" appendix of this publication. Figure H presents CV's for foreign tax credits by selected NAICS divisions, industrial sectors, and groups. The smaller the CV, the more reliable the estimate is judged to be.

Description of Tables 1-3

Tables 1a and 1b present various industry data using the North American Industry Classification System (NAICS) and the previously used Standard Industrial Classification System (SIC), respectively. Columns 2 through 15 display statistics on assets, receipts, income, and taxes reported on Form 1120, *Corporation Income Tax Return*, for those corporations claiming a foreign tax credit. Columns 16 through 52 present statistics from Form 1118, *Foreign Tax*

Figure H

Coefficients of Variation for Foreign Tax Credit, by Selected Industrial Group, Tax Year 1998

Selected industrial group	Coefficients of variation for foreign tax credit (percentages)
All industries.....	0.02
Agriculture, forestry, fishing, and hunting.....	0.02
Mining.....	0.32
Utilities.....	0.02
Construction.....	2.40
Manufacturing.....	0.01
Food manufacturing.....	0.04
Plastics and rubber products manufacturing.....	0.07
Chemical manufacturing.....	0.03
Petroleum and coal products manufacturing.....	0.01
Computer and electronic product manufacturing.....	0.01
Transportation equipment manufacturing.....	(¹)
Wholesale trade.....	0.35
Retail trade.....	0.48
Transportation and warehousing.....	0.10
Information.....	0.05
Finance and insurance.....	0.13
Real estate and rental and leasing.....	2.50
Professional, scientific, and technical services.....	0.54
Management of companies (holding companies).....	0.11
Administrative and support and waste management and remediation services.....	0.17
Educational services.....	9.34
Health care and social assistance.....	0.02
Arts, entertainment, and recreation.....	0.15
Accommodation and food services.....	0.01
Other services.....	0.31

¹ Less than .005 percent

Credit--Corporations. References to tax return schedules indicate the parts of Form 1118 from which the data were obtained. Columns 16 through 36 present statistics on foreign income 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 36, respectively) are included in the summary columns (columns 16 through 22 and 26 through 35), these amounts are also shown separately (based 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 41 of Tables 1a and 1b and column 27 of Table 2.

Internal Revenue Code section 863(b) income (income partly within and partly without the United States) and foreign branch income are also included in the summary totals reported in columns 16 through 22 of Tables 1a and 1b, and are shown separately (based on Form 1118, Schedule F, *Gross Income and Definitely Allocable Deductions From Sources Outside the U.S. Under Section 863(b) and for Foreign Branches*) in columns 24 and 25 of Tables 1a and 1b.

Total deductions “not definitely allocable” to specific types of income (column 32) are equal to the sum of Tables 1a, 1b, columns 33 through 35, relating to research and development, interest, and any other not definitely allocable expenses (any differences are due to taxpayer reporting variations). Total foreign-source gross income (Tables 1a and 1b, column 16) less total foreign deductions (Tables 1a and 1b, column 26) equals foreign-source taxable income before adjustments (Tables 1a and 1b, column 37).

Adjustments to foreign-source taxable income (column 38 of Tables 1a and 1b) 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 39 of Tables 1a and 1b. 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 statutory income category or “basket.”

Statistics on foreign taxes are presented in columns 40 through 52 of Tables 1a and 1b. Data on foreign taxes paid, accrued, or deemed paid (through related foreign corporations or their subsidiaries) from Form 1118, Schedule B, *Foreign Tax Credit – Corporation*, are shown in columns 43 through 52 of Tables 1a and 1b. Total foreign taxes paid or ac-

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crued (Tables 1a and 1b, column 44) are the sum of columns 45 through 51 (any differences are due to taxpayer reporting variations). Column 42 in Tables 1a and 1b shows carryovers of excess or "unused" taxes from prior years, which can be added to the 1998 pool of current-year creditable foreign taxes. Total foreign taxes paid, accrued, or 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, reductions of foreign taxes related to income earned in sanctioned countries under Internal Revenue Code section 901(j), and other reductions of creditable taxes) in column 41. Thus, total foreign taxes available for credit (Tables 1a and 1b, column 40) are equal to total foreign taxes paid, accrued, or deemed paid (column 43), plus any carryover of prior-year excess or "unused" foreign taxes (column 42), less any reduction in foreign taxes (Column 41).

Tables 2 and 3 present data using NAICS and are similar in column format to Tables 1a and 1b, except that they do not provide data from the corporation income tax returns, themselves. Table 2 presents data by industrial grouping and separate statutory limitation income category or 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 38 of Tables 1a and 1b and column 24 of Table 2.

Carryover of foreign taxes.--Under Internal Revenue Code section 904, "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. 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 1998 statistics used for this article

include only those foreign taxes that have been carried forward from previous years (1993-1997). See column 42 of Tables 1a and 1b and column 28 of Table 2.

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. 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.

Current-year foreign taxes.--Current-year foreign taxes include foreign taxes paid, accrued, or deemed paid and are shown in column 43 of Tables 1a and 1b, column 29 of Table 2, and column 15 of Table 3. Current-year foreign taxes do not include any carryback or carryforward of foreign taxes from other tax years.

European Union (E.U.).--The European Union (E.U.) is a union of fifteen independent states based on the former European Community and founded to enhance political, economic, and social cooperation. Formerly known as the European Community (EC) or the European Economic Community (EEC), the member states include Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, the Netherlands, Portugal, Spain, Sweden, and the United Kingdom.

Financial Services Income.--This separate limitation category or basket applies to income from the specific industry of financial services. 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 non-controlled foreign corporations as defined in Internal Revenue Code section 902, or certain types of export financing interest.

Foreign Oil and Gas Extraction Income (FOGEI).--FOGEI is the gross income produced from the extraction of oil and gas, as well as from the sale of assets used in the extraction of oil and gas, or

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from related services, working capital, dividend and partnership distributions, and any other oil and gas extraction income. In general, a foreign tax credit, a foreign tax, or deduction 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 sale price differs from the fair market value.

Foreign Sales Corporations (FSC).--A Foreign Sales Corporation was a company incorporated abroad and usually 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, FSC dividends received by corporations claiming a foreign tax credit are included. Dividends and interest generated by a FSC comprise a separate limitation category. In July 1999, the World Trade Organization 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 FSC's 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.

Foreign trade income.--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 1998 statistics because of the defined scope of the SOI sample (see definition for *FSC* above).

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

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 with respect to the distribution. 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.

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 in the financing of certain export activities.

Income re-sourced by treaty.--Selected U.S. income tax treaties contain provisions reclassifying certain income items from being U.S.-source income to foreign-source income. This usually occurs when a tax treaty allows the other country to tax what would otherwise be U.S.-source income. Certain dividends 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 re-sourced from a treaty country.

Interest-Charge Domestic International Sales Corporation (IC-DISC).--IC-DISC's were small domestic corporations formed to export U.S. products. An IC-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 DISC level. Instead, the corporate shareholder was taxed directly on a portion of the DISC's income that is 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 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 (FSC's), now also repealed. To elect IC-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 as-

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sets.” Distributions from an IC-DISC are a separate limitation category.

Non-controlled section 902 corporation.--A non-controlled 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.” Each non-controlled section 902 corporation is treated individually. The dividends from each corporation are placed in separate categories or baskets to avoid the averaging of high-taxed and low-taxed dividends from different non-controlled section 902 corporations.

OPEC Countries.--The members of the Organization of Petroleum Exporting Countries (OPEC) for 1998 were Algeria, Indonesia, Iran, Iraq, Kuwait, Libya, Nigeria, Qatar, Saudi Arabia, the United Arab Emirates, and Venezuela.

Passive Income.--This separate limitation category or basket includes dividends, interest (with the exception noted below), rents, royalties, annuities, net capital gains, and commodity transactions not connected with the active conduct of a trade or business. High-taxed passive income is excluded from this basket and is included, instead, under financial services income. 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 versus 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 for the credit. 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 1998, 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 the specific industry, shipping. 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. 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” and is shown in Tables 1a and 1b, column 25, and Tables 2 and 3, column 11.

Tax deemed paid.--See *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.

Notes and References

- [1] Since income tax returns for FSC’s were not a part of the sample used for the statistics, this income category is not included. Distributions from FSC’s or former FSC’s are reported on the parent corporation’s return and are included in these statistics when provided by the taxpayers. In this study, this particular statutory category is used when corporations report an irregular separate category of income that cannot be redefined for one of the existing categories of income.
- [2] A foreign tax credit is not allowed for foreign taxes paid to countries sanctioned by the U.S.

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Government. Nevertheless, a foreign tax credit limitation is computed for each sanctioned country. These countries for 1998 are Cuba, Iran, Iraq, Libya, North Korea, Sudan, and Syria.

- [3] See Green, Kathryn A. and Luttrell, Scott, "Corporate Foreign Tax Credit, 1997," *Statistics of Income Bulletin*, Winter 2001-2002, Volume 21, Number 3.
- [4] Current-year foreign taxes divided by foreign-source taxable income should not be used as a measure of the effective tax rate. This rate would contain a measure of economic income in the denominator and taxes on that income in the

numerator. These percentages are a tool used to compare the proportion of taxes to foreign-source taxable income in each statutory group.

- [5] The income, deductions, and taxes related to foreign oil and gas extraction income (FOGEI) are reported on Schedule I, *Reduction of Oil and Gas Extraction Taxes*, of Form 1118, *Foreign Tax Credit--Corporations*.
- [6] *North American Industry Classification System United States, 1997*, Executive Office of the President, Office of Management and Budget, 1998.
- [7] Internal Revenue Service, *Statistics of Income --1998, Corporation Income Tax Returns*.

SOURCE: IRS, *Statistics of Income Bulletin*, Fall 2002. Publication 1136 (Rev. 12-2002).

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Table 1a.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by NAICS Classification)

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

Major and selected minor industrial group	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 resulting from foreign taxes deemed paid (gross-up)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All industries.....	5,927	15,174,244,548	5,367,522,238	35,296,572	19,520	22,187,348	27,092,409
Agriculture, forestry, fishing, and hunting.....	81	2,777,716	2,915,409	*27,219	--	*16,116	*43,927
Mining.....	101	78,195,566	36,927,692	188,303	--	187,449	117,991
Metal mining.....	44	3,951,272	1,347,109	*26,524	--	*50	*16,915
Coal mining.....	5	*7,377,219	*4,747,531	*8	--	*411	*109
Oil and gas extraction.....	9	*25,498,493	*7,920,350	*47,695	--	*12,511	*13,180
Nonmetallic minerals, except fuels.....	44	41,368,583	22,912,701	114,075	--	174,476	87,786
Utilities.....	23	243,364,734	92,337,173	1,035,449	--	372,729	588,933
Construction.....	221	12,113,091	14,412,001	21,018	--	*26,538	*31,498
General building contractors.....	95	4,668,120	6,767,900	8,945	--	*26,443	*24,831
Heavy construction contractors.....	32	5,439,365	4,342,807	*3,884	--	*62	*2,121
Special trade contractors.....	65	1,081,349	1,873,648	*8,179	--	--	*4,546
Manufacturing.....	1,510	3,923,042,786	2,419,087,684	26,982,434	17,957	14,360,120	21,150,959
Food manufacturing.....	53	157,198,108	142,972,954	1,758,776	*66	501,876	1,046,028
Beverage and tobacco product manufacturing.....	17	281,654,235	84,368,589	*2,224,659	--	*1,338,856	*1,629,176
Beverage manufactures.....	14	194,296,090	33,541,971	*1,025,218	--	*249,254	*538,723
Tobacco manufactures.....	3	*87,358,145	*50,826,618	*1,199,441	--	*1,089,603	*1,090,453
Textile mill and textile products mills.....	46	15,042,216	13,405,862	21,922	--	*23,113	14,351
Apparel manufacturing.....	49	15,121,040	18,997,041	*204,018	--	*75,016	*158,478
Wood product manufacturing.....	14	29,901,364	19,667,132	*5,004	--	*5,780	*2,325
Paper manufacturing.....	29	61,474,804	46,769,679	545,913	--	*156,632	485,695
Printing and related support activities.....	41	5,590,116	6,293,780	*2,219	*21	*5,261	*1,423
Petroleum and coal products manufacturing.....	26	524,142,876	301,026,491	5,028,786	--	1,029,593	2,894,834
Chemical manufacturing.....	259	630,348,854	399,543,353	6,066,241	*10,208	3,614,643	5,081,376
Pharmaceutical and medicine manufacturing.....	61	229,463,078	151,577,017	2,388,147	--	2,093,464	2,539,621
Other chemical manufacturing.....	198	400,885,777	247,966,336	3,678,093	*10,208	1,521,179	2,541,756
Plastics and rubber products manufacturing.....	60	27,127,329	28,795,315	457,580	*602	43,574	343,973
Nonmetallic mineral product manufacturing.....	27	31,893,603	19,506,621	211,121	--	*142,647	203,170
Primary metal manufacturing.....	39	76,148,350	48,360,597	382,639	--	*265,955	258,125
Fabricated metal product manufacturing.....	159	64,360,073	51,360,896	679,402	*322	276,527	517,814
Machinery manufacturing.....	188	170,779,548	158,978,148	2,838,602	*3,541	816,947	1,574,683
Computer and electronic products.....	174	323,583,061	336,141,763	2,849,344	*965	2,438,050	2,696,812
Electrical equipment, appliance, and component.....	85	542,986,154	148,468,280	496,898	*391	845,856	1,389,488
Transportation equipment manufacturing.....	87	885,748,515	530,489,956	2,729,757	--	2,486,735	2,527,878
Motor vehicles and equipment.....	49	738,754,764	386,700,434	2,420,106	--	2,263,557	2,308,444
Other transportation equipment manufacturing.....	38	146,993,751	143,789,523	309,652	--	223,178	219,434
Furniture and related products.....	17	7,659,663	11,036,907	*61,881	--	*61,291	*50,050
Miscellaneous manufacturing and manufacturing not allocable.....	139	72,282,875	52,904,320	417,673	*1,842	231,766	275,280
Wholesale and retail trade.....	809	392,019,740	672,462,878	1,730,688	*1,563	864,484	747,557
Wholesale trade.....	621	208,908,799	287,672,730	1,131,366	*1,563	628,090	504,838
Durable goods.....	451	105,733,657	161,373,829	111,935	*537	70,489	84,426
Nondurable goods.....	170	103,175,142	126,298,901	1,019,431	*1,026	557,602	420,413
Drugs, chemicals, and allied products.....	8	*14,428,008	*25,518,836	*94,222	*1,026	*35,064	*38,524
Petroleum and petroleum products.....	39	1,526,742	3,139,267	*1,379	--	--	*52
Other miscellaneous wholesale trade.....	13	17,467,249	10,744,232	*85,482	--	*49,648	*53,602
Other nondurable goods.....	110	69,753,143	86,896,565	838,348	--	472,890	328,265

Footnotes at end of table.

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Table 1a.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by NAICS Classification)--Continued

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

Major and selected minor industrial group	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 resulting from foreign taxes deemed paid (gross-up)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Retail trade.....	187	183,110,941	384,790,148	599,321	--	236,393	242,719
Motor vehicle and parts dealers.....	17	*384,111	*926,771	*9	--	*7	--
Food and beverage stores.....	9	*3,942,888	*8,630,118	*4	--	--	--
Clothing and clothing accessories stores.....	15	29,116,349	44,306,910	*531,012	--	*135,566	*191,858
General merchandise stores.....	8	*99,650,020	*240,026,464	*7,232	--	*65,769	*10,620
All other retail stores.....	139	50,017,574	90,899,884	61,063	--	*35,052	40,241
Transportation and warehousing.....	87	101,614,361	97,087,295	72,381	--	91,383	64,475
Transportation.....	82	101,466,187	97,021,446	71,866	--	90,400	64,024
Water transportation.....	11	4,996,797	2,976,879	*11,220	--	*61,319	*17,061
All other transportation.....	71	96,469,390	94,044,567	60,646	--	29,081	46,964
Warehousing and storage.....	5	*148,173	*65,849	*515	--	*984	*450
Information.....	161	563,088,879	311,630,660	1,244,442	--	1,691,930	1,276,973
Publishing industries.....	90	184,407,841	101,128,796	605,211	--	367,884	491,675
Motion picture and sound recording industries.....	25	38,432,088	19,874,118	*167,586	--	*46,619	*119,264
Broadcasting and telecommunications.....	29	301,653,350	165,867,566	*318,520	--	*1,110,806	*447,921
Broadcasting.....	10	103,396,411	44,497,711	*103,838	--	*560,249	*167,479
Telecommunications.....	19	198,256,939	121,369,855	*214,682	--	*550,557	*280,442
Information and data processing services.....	17	38,595,600	24,760,180	*153,125	--	*166,621	*218,114
Finance, insurance, and real estate.....	1,490	6,414,749,088	1,193,537,627	1,691,838	*(²)	2,936,462	1,371,051
Finance and insurance.....	1,204	6,401,838,977	1,187,373,869	1,690,220	*(²)	2,921,145	1,363,714
Depository credit intermediation.....	32	26,674,598	3,659,570	930	--	*4,859	*17
Nondepository credit intermediation.....	19	562,601,243	82,289,024	*112,956	--	*314,068	*41,706
Securities, commodity contracts, etc.....	841	2,333,457,537	182,475,636	610,998	*(²)	794,541	796,549
Insurance carriers and related activities.....	306	3,478,622,548	918,641,650	965,314	--	1,807,676	525,441
Other finance and insurance.....	6	*483,050	*307,989	*23	--	--	--
Real estate and rental and leasing.....	286	12,910,111	6,163,758	1,618	--	*15,317	*7,337
Services.....	1,435	3,415,028,954	510,655,284	2,226,327	--	1,627,913	1,651,554
Professional, scientific, and technical services.....	459	77,516,792	79,254,997	234,737	--	187,921	179,001
Management of companies (holding companies).....	725	3,132,674,033	290,244,426	1,461,434	--	1,199,039	1,071,340
Educational, health care, and social assistance.....	38	52,441,528	28,739,764	*34,051	--	*9,973	*22,488
Arts, entertainment, and recreation.....	15	2,529,931	2,288,627	*78,500	--	*16,895	*19,798
Accommodation and food services.....	68	71,578,490	60,338,704	189,296	--	*69,319	*207,254
Other services.....	130	78,288,181	49,788,765	228,309	--	144,766	151,673

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1a.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by NAICS Classification)--Continued

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

Major and selected minor industrial group	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	General business credit	U.S. income tax after credits ³
			Total	Regular and alternative minimum tax				
	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
All industries.....	398,898,244	377,129,783	132,740,630	132,832,709	37,338,380	339,990	3,855,629	88,652,512
Agriculture, forestry, fishing, and hunting.....	483,149	460,741	160,561	160,558	54,317	-	*5,431	98,620
Mining.....	3,961,566	3,688,470	1,336,802	1,335,765	501,907	-	*55,317	766,093
Metal mining.....	288,995	286,114	103,746	103,556	74,417	-	*3	24,943
Coal mining.....	*194,282	*189,300	*74,314	*74,314	*13,124	-	*1	*61,175
Oil and gas extraction.....	*825,164	*753,081	*281,127	*281,127	*142,640	-	-	*138,179
Nonmetallic minerals, except fuels.....	2,653,125	2,459,975	877,614	876,768	271,727	-	*55,313	541,796
Utilities.....	10,587,727	10,530,100	3,689,081	3,688,583	529,461	-	117,513	2,863,952
Construction.....	878,480	853,177	298,436	295,555	49,696	-	*10,507	231,872
General building contractors.....	400,320	383,031	132,750	132,601	29,431	-	*10,234	88,316
Heavy construction contractors.....	375,250	373,214	131,826	130,020	11,338	-	*227	118,861
Special trade contractors.....	78,131	72,692	25,117	24,905	7,910	-	*2	17,013
Manufacturing.....	188,367,924	176,643,120	62,266,015	62,365,963	26,738,054	333,719	2,232,476	31,917,015
Food manufacturing.....	8,811,241	8,516,790	3,008,482	3,008,475	1,174,614	*155	62,698	1,720,133
Beverage and tobacco product manufacturing.....	11,562,301	10,966,805	3,847,052	3,847,052	1,975,815	*45,056	*19,871	1,796,279
Beverage manufactures.....	3,993,071	3,656,875	1,288,576	1,288,576	761,321	*45,056	*2,539	478,715
Tobacco manufactures.....	*7,569,230	*7,309,930	*2,558,475	*2,558,475	*1,214,494	-	*17,332	*1,317,564
Textile mill and textile products mills.....	518,576	455,189	160,574	160,574	14,720	-	*3,068	138,676
Apparel manufacturing.....	1,746,592	1,741,726	616,189	616,007	158,515	*229	*4,136	453,306
Wood product manufacturing.....	767,894	736,160	257,554	257,554	6,949	-	*713	234,840
Paper manufacturing.....	4,152,127	4,008,568	1,418,543	1,418,797	553,314	*114	51,509	797,546
Printing and related support activities.....	412,594	409,821	143,100	143,100	3,030	*348	*792	138,502
Petroleum and coal products manufacturing.....	21,053,878	20,561,418	7,207,305	7,214,608	4,268,386	-	152,729	2,381,235
Chemical manufacturing.....	41,571,896	38,046,451	13,407,403	13,407,504	5,522,571	*264,297	611,826	6,795,989
Pharmaceutical and medicine manufacturing.....	20,724,381	19,080,976	6,684,909	6,684,909	2,660,359	*260,579	469,941	3,247,792
Other chemical manufacturing.....	20,847,515	18,965,475	6,722,494	6,722,595	2,862,211	*3,718	141,885	3,548,197
Plastics and rubber products manufacturing.....	2,194,162	2,100,658	735,110	736,932	334,187	-	10,136	340,754
Nonmetallic mineral product manufacturing.....	1,859,250	1,706,378	600,350	600,350	142,795	-	6,151	434,974
Primary metal manufacturing.....	2,743,242	2,517,785	881,953	893,599	350,613	-	17,138	465,273
Fabricated metal product manufacturing.....	5,687,430	5,423,217	1,896,616	1,896,534	597,459	*784	11,287	1,277,209
Machinery manufacturing.....	15,713,590	14,220,598	4,986,844	4,987,219	2,049,854	*14,545	126,609	2,753,231
Computer and electronic products.....	32,775,807	30,722,615	10,890,520	10,890,507	4,839,162	-	559,034	5,393,982
Electrical equipment, appliance, and component.....	8,907,948	8,367,441	2,883,494	2,974,022	1,481,993	-	40,146	1,351,433
Transportation equipment manufacturing.....	21,445,597	20,141,949	7,220,634	7,208,831	2,909,198	-	481,735	3,779,696
Motor vehicles and equipment.....	15,840,430	15,198,675	5,491,076	5,479,053	2,598,447	-	416,673	2,442,052
Other transportation equipment manufacturing.....	5,605,167	4,943,273	1,729,558	1,729,779	310,751	-	65,063	1,337,644
Furniture and related products.....	976,370	961,317	335,769	335,781	53,436	-	*3,743	278,057
Miscellaneous manufacturing and manufacturing not allocable.....	5,467,428	5,038,232	1,768,524	1,768,516	301,444	*8,190	69,154	1,385,899
Wholesale and retail trade.....	30,125,190	29,447,253	10,325,525	10,327,617	1,033,628	-	168,647	8,837,072
Wholesale trade.....	10,791,346	10,199,230	3,578,338	3,578,612	574,516	-	74,672	2,716,677
Durable goods.....	5,528,927	5,293,601	1,848,786	1,849,074	100,685	-	28,049	1,619,886
Nondurable goods.....	5,262,419	4,905,629	1,729,552	1,729,538	473,832	-	46,623	1,096,791
Drugs, chemicals, and allied products.....	*674,197	*578,675	*202,458	*202,458	*49,906	-	*3,889	*126,790
Petroleum and petroleum products.....	73,176	71,174	24,045	24,045	2,880	-	-	18,276
Other miscellaneous wholesale trade.....	392,141	316,442	110,451	110,451	30,043	-	*5,701	61,190
Other nondurable goods.....	4,122,905	3,939,339	1,392,598	1,392,584	391,002	-	37,033	890,536

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1a.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by NAICS Classification)--Continued

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

Major and selected minor industrial group	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	General business credit	U.S. income tax after credits ³
			Total	Regular and alternative minimum tax				
	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
Retail trade.....	19,333,844	19,248,023	6,747,187	6,749,005	459,112	--	93,975	6,120,395
Motor vehicle and parts dealers.....	*37,710	*37,526	*12,967	*12,967	*116	--	*33	*12,777
Food and beverage stores.....	*181,369	*179,736	*61,527	*62,913	*10,016	--	*1,201	*50,310
Clothing and clothing accessories stores.....	3,876,947	3,869,289	1,364,978	1,364,978	247,749	--	*6,187	1,107,324
General merchandise stores.....	*9,786,220	*9,742,339	*3,410,043	*3,410,039	*66,037	--	*57,640	*3,221,392
All other retail stores.....	5,451,600	5,419,133	1,897,672	1,898,108	135,194	--	28,914	1,728,591
Transportation and warehousing.....	6,766,200	6,167,224	2,201,616	2,201,616	149,813	--	36,451	1,571,390
Transportation.....	6,757,541	6,158,971	2,198,810	2,198,810	149,234	--	36,451	1,569,162
Water transportation.....	465,050	407,239	146,760	146,760	56,152	--	*1,438	77,840
All other transportation.....	6,292,491	5,751,731	2,052,050	2,052,050	93,082	--	35,013	1,491,322
Warehousing and storage.....	*8,659	*8,253	*2,806	*2,806	*579	--	--	*2,227
Information.....	36,395,986	34,674,070	12,144,430	12,147,233	1,608,877	--	265,171	10,238,779
Publishing industries.....	10,596,026	9,378,929	3,313,690	3,311,596	697,470	--	58,516	2,551,891
Motion picture and sound recording industries.....	2,375,541	2,232,989	784,763	783,973	122,179	--	*1,340	661,154
Broadcasting and telecommunications.....	20,318,811	20,030,173	6,984,901	6,990,587	536,669	--	*116,282	6,309,669
Broadcasting.....	2,650,164	2,422,045	848,869	848,868	235,176	--	*11,862	*600,909
Telecommunications.....	17,668,647	17,608,128	6,136,032	6,141,719	301,493	--	*104,420	5,708,760
Information and data processing services.....	3,105,608	3,031,979	1,061,077	1,061,077	252,559	--	*89,032	716,064
Finance, insurance, and real estate.....	76,170,975	70,649,020	24,863,054	24,858,995	3,065,854	--	364,373	21,073,736
Finance and insurance.....	75,599,871	70,199,824	24,704,831	24,702,565	3,053,584	--	364,279	20,928,406
Depository credit intermediation.....	398,305	382,846	132,920	132,920	6,606	--	*670	125,515
Nondepository credit intermediation.....	5,428,608	5,229,377	1,830,110	1,830,106	197,499	--	*56,134	1,575,206
Securities, commodity contracts, etc.....	13,105,902	12,470,039	4,372,533	4,371,164	1,403,892	--	34,830	2,841,052
Insurance carriers and related activities.....	56,565,860	52,016,745	18,333,963	18,333,070	1,444,097	--	272,645	16,352,818
Other finance and insurance.....	101,195	*100,817	*35,306	*35,306	*1,490	--	--	*33,816
Real estate and rental and leasing.....	571,104	449,196	158,223	156,430	12,270	--	*94	145,330
Services.....	43,546,409	42,409,299	14,888,593	14,884,313	3,571,425	*6,271	589,557	10,542,141
Professional, scientific, and technical services.....	7,741,146	7,317,795	2,563,971	2,562,392	397,237	--	145,258	2,010,747
Management of companies (holding companies).....	26,034,004	25,470,688	8,949,661	8,948,539	2,523,987	--	343,971	5,962,897
Educational, health care, and social assistance.....	2,388,312	2,363,945	826,885	826,885	24,367	--	*4,037	797,701
Arts, entertainment, and recreation.....	239,313	225,954	78,435	78,435	55,543	--	*1,590	21,259
Accommodation and food services.....	3,905,179	3,849,620	1,354,676	1,353,669	408,982	*6,271	75,424	861,866
Other services.....	3,238,455	3,181,298	1,114,964	1,114,394	161,310	--	19,278	887,670

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1a.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by NAICS Classification)--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118						
	Gross income (less loss)						
	Total	Dividends	Foreign dividend income resulting from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Service income	Other income
(16)	(17)	(18)	(19)	(20)	(21)	(22)	
All industries.....	349,386,789	60,541,096	27,074,099	68,413,782	55,875,295	23,414,004	114,068,512
Agriculture, forestry, fishing, and hunting.....	290,450	62,274	*43,927	*26,361	*18,293	*1	*139,594
Mining.....	5,357,393	363,579	117,974	228,918	409,764	2,043,709	2,193,449
Metal mining.....	488,846	*26,566	*16,915	*40,286	*127	*6,144	398,808
Coal mining.....	*111,146	*420	*109	*21,052	--	--	*89,564
Oil and gas extraction.....	*1,602,459	*61,604	*13,164	*93,075	*50,610	*219,828	*1,164,178
Nonmetallic minerals, except fuels.....	3,154,942	274,989	87,786	74,505	359,027	1,817,736	540,898
Utilities.....	3,303,485	1,407,780	588,656	566,225	*40,447	127,571	572,805
Construction.....	558,544	47,556	*31,498	5,390	19,911	331,390	122,799
General building contractors.....	251,516	35,491	*24,831	*2,900	*8,316	*172,058	*7,920
Heavy construction contractors.....	166,883	*3,949	*2,121	*98	*7,816	*110,234	*42,665
Special trade contractors.....	119,501	8,073	*4,546	*2,345	*3,780	*28,704	*72,052
Manufacturing.....	167,963,972	44,303,840	21,134,234	9,412,797	35,137,332	3,360,666	54,615,104
Food manufacturing.....	5,977,147	2,328,590	1,046,341	122,402	706,982	*46,465	1,726,367
Beverage and tobacco product manufacturing.....	11,089,926	*3,573,477	*1,618,222	274,635	*2,589,306	*110,319	2,923,967
Beverage manufactures.....	4,814,672	*1,274,468	*538,518	*223,093	*1,423,065	*110,319	*1,245,209
Tobacco manufactures.....	*6,275,254	*2,299,009	*1,079,703	*51,542	*1,166,241	--	*1,678,758
Textile mill and textile products mills.....	218,292	44,819	14,348	*33,055	*45,415	*1,951	*78,706
Apparel manufacturing.....	833,084	278,957	158,483	6,121	293,924	*11,624	*83,974
Wood product manufacturing.....	86,802	*6,531	*2,325	*33,760	*10,499	--	*33,688
Paper manufacturing.....	2,408,960	792,947	485,695	45,279	513,358	*51,090	520,591
Printing and related support activities.....	55,999	*7,480	*1,423	*756	*15,191	*12,428	*18,721
Petroleum and coal products manufacturing.....	27,941,656	6,072,307	2,893,166	3,798,365	503,055	*97,998	14,576,765
Chemical manufacturing.....	32,412,739	9,958,280	5,078,100	847,523	6,454,181	470,718	9,603,936
Pharmaceutical and medicine manufacturing.....	14,704,055	4,394,083	2,536,194	258,788	2,840,547	*222,553	4,451,890
Other chemical manufacturing.....	17,708,684	5,564,197	2,541,906	588,735	3,613,634	248,165	5,152,046
Plastics and rubber products manufacturing.....	1,701,562	505,843	343,973	62,863	362,009	*35,622	391,253
Nonmetallic mineral product manufacturing.....	822,084	426,917	203,170	14,797	104,984	*9,714	62,502
Primary metal manufacturing.....	2,021,069	682,164	258,075	115,563	102,429	*12,613	850,225
Fabricated metal product manufacturing.....	3,088,191	980,240	518,019	96,405	244,060	109,198	1,140,269
Machinery manufacturing.....	12,658,071	4,571,173	1,574,369	638,806	1,491,328	213,693	4,168,702
Computer and electronic products.....	36,075,703	6,483,683	2,696,496	672,790	17,682,296	544,708	7,995,730
Electrical equipment, appliance, and component.....	11,519,570	1,385,368	1,389,440	1,749,019	838,993	976,492	5,180,258
Transportation equipment manufacturing.....	15,895,256	5,216,959	2,527,923	822,001	2,501,494	628,267	4,198,612
Motor vehicles and equipment.....	11,494,280	4,642,366	2,308,489	402,737	1,771,231	*3,838	2,365,619
Other transportation equipment manufacturing.....	4,400,976	574,593	219,434	419,264	730,263	*624,429	1,832,994
Furniture and related products.....	222,264	*123,173	*50,050	*7,405	10,029	--	31,607
Miscellaneous manufacturing and manufacturing not allocable.....	2,935,598	864,935	274,615	71,251	667,798	27,766	1,029,233
Wholesale and retail trade.....	9,007,432	2,595,939	747,611	416,232	1,058,946	500,106	3,688,599
Wholesale trade.....	5,705,569	1,760,574	504,884	348,788	336,797	139,047	2,615,479
Durable goods.....	1,276,168	182,581	84,425	99,613	74,992	42,315	792,242
Nondurable goods.....	4,429,402	1,577,993	420,459	249,175	261,806	96,732	1,823,237
Drugs, chemicals, and allied products.....	*407,979	*129,246	*38,524	*8,595	*109,956	*2,697	*118,960
Petroleum and petroleum products.....	69,278	*1,379	*22	*10,463	*4,844	*3,929	*48,640
Other miscellaneous wholesale trade.....	333,308	*135,132	*53,604	*4,347	*309	*3,444	*136,473
Other nondurable goods.....	3,618,837	1,312,236	328,309	225,769	146,697	86,661	1,519,164

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1a.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by NAICS Classification)--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118						
	Gross income (less loss)						
	Total	Dividends	Foreign dividend income resulting from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Service income	Other income
	(16)	(17)	(18)	(19)	(20)	(21)	(22)
Retail trade.....	3,301,863	835,365	242,727	67,444	722,149	*361,059	1,073,120
Motor vehicle and parts dealers.....	*1,164	*16	--	*257	*699	--	*192
Food and beverage stores.....	*73,973	*10	--	*3,479	*69,056	--	*1,428
Clothing and clothing accessories stores.....	1,325,951	666,547	*191,863	*7,714	88,647	--	371,180
General merchandise stores.....	*714,141	*73,041	*10,620	*21,179	*137,559	*191,669	*280,073
All other retail stores.....	1,186,635	95,751	40,244	34,815	426,188	*169,390	420,247
Transportation and warehousing.....	9,086,753	162,535	64,475	54,343	72,419	8,695,634	37,348
Transportation.....	9,083,166	161,036	64,024	52,716	72,419	8,695,634	37,337
Water transportation.....	309,614	*72,101	*17,060	*6,814	*110	*187,447	*26,081
All other transportation.....	8,773,553	88,935	46,964	45,902	72,309	8,508,187	11,256
Warehousing and storage.....	*3,587	*1,499	*450	*1,627	--	--	*11
Information.....	31,202,763	3,115,765	1,274,993	453,340	13,941,701	1,597,173	10,819,790
Publishing industries.....	16,703,997	1,012,435	491,674	104,523	10,342,629	207,483	4,545,253
Motion picture and sound recording industries.....	2,060,009	214,209	*119,264	*306	404,723	*14,305	*1,307,203
Broadcasting and telecommunications.....	10,185,150	1,569,335	*445,981	*297,735	2,858,142	*260,557	4,753,400
Broadcasting.....	3,977,269	*804,809	*165,595	*150,186	*2,700,489	*682	*155,508
Telecommunications.....	6,207,881	*764,526	*280,387	*147,549	*157,653	*259,876	*4,597,892
Information and data processing services.....	2,253,606	*319,787	*218,073	*50,776	*336,207	1,114,828	*213,935
Finance, insurance, and real estate.....	55,137,632	4,464,750	1,370,649	22,304,212	1,170,297	2,818,974	23,008,749
Finance and insurance.....	54,984,526	4,448,156	1,363,312	22,281,377	1,112,009	2,782,489	22,997,183
Depository credit intermediation.....	211,210	5,799	*24	*196,163	*284	*8,644	*296
Nondepository credit intermediation.....	8,555,687	372,548	*41,706	2,002,612	*199,180	*664,182	5,275,458
Securities, commodity contracts, etc.....	21,356,984	1,313,005	796,571	12,415,304	95,022	463,381	6,273,700
Insurance carriers and related activities.....	24,793,095	2,756,780	525,011	7,666,755	813,100	1,632,749	11,398,701
Other finance and insurance.....	*67,550	*24	--	*542	*4,422	*13,534	*49,027
Real estate and rental and leasing.....	153,106	16,594	*7,337	22,836	58,288	*36,485	11,567
Services.....	67,282,303	3,928,370	1,652,590	34,944,806	4,006,186	3,938,780	18,811,570
Professional, scientific, and technical services.....	7,461,182	449,347	180,575	104,638	1,563,225	2,675,154	2,488,243
Management of companies (holding companies).....	54,946,522	2,695,659	1,070,770	34,484,151	1,385,281	541,363	14,769,299
Educational, health care, and social assistance.....	241,073	44,026	*22,488	*396	41,491	*94,736	*37,936
Arts, entertainment, and recreation.....	559,701	*108,719	*19,798	*2,187	110,053	*308,281	*10,663
Accommodation and food services.....	2,904,182	256,541	*207,254	268,550	744,483	*110,711	1,316,643
Other services.....	1,169,643	374,077	151,706	84,884	161,654	208,536	188,787

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1a.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by NAICS Classification)--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued							
	Gross income (less loss)--Continued			Deductions				
	Oil and gas extraction income (less loss) ⁴	Foreign branch income ⁴	Specifically allocable income [section 863(b)] ⁴	Total	Deductions allocable to specific types of income			
					Total	Rental, royalty, and licensing expenses		Service expenses
				Depreciation, depletion, and amortization	Other			
	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)
All industries.....	15,127,351	87,251,267	9,176,112	202,269,920	108,022,787	1,290,753	6,110,720	13,036,724
Agriculture, forestry, fishing, and hunting.....	--	--	*127,202	*119,484	*71,634	--	*686	*(?)
Mining.....	*369,280	1,975,904	--	3,290,604	2,451,032	102,247	25,709	649,775
Metal mining.....	*358,226	*159,600	--	229,896	154,820	*9,961	*247	*1,023
Coal mining.....	--	*61,285	--	*63,206	*48,698	--	--	--
Oil and gas extraction.....	--	*234,332	--	*1,148,101	*915,505	--	*592	*9,529
Nonmetallic minerals, except fuels.....	*11,054	1,520,687	--	1,849,402	1,332,008	*92,286	*24,870	639,223
Utilities.....	*2,372	*621,175	--	1,225,796	581,522	*5,784	*1,060	*11,606
Construction.....	--	*107,451	--	381,474	336,455	*1,183	*1,675	256,540
General building contractors.....	--	*51,692	--	*157,046	*155,020	*10	*455	*139,379
Heavy construction contractors.....	--	*27,581	--	*117,482	*91,695	*1,148	*992	*84,747
Special trade contractors.....	--	*19,856	--	89,464	72,257	*25	*228	*21,520
Manufacturing.....	14,612,814	21,097,281	8,215,612	76,260,938	42,276,285	224,324	1,741,975	1,240,576
Food manufacturing.....	--	792,900	*71,879	2,354,105	1,510,336	*1,504	*1,363	*16,539
Beverage and tobacco product manufacturing.....	--	*1,791,352	--	4,155,100	*2,522,761	--	*776,423	*550
Beverage manufactures.....	--	*836,534	--	*1,823,496	*891,449	--	*739,658	*550
Tobacco manufactures.....	--	*954,818	--	*2,331,604	*1,631,312	--	*36,764	--
Textile mill and textile products mills.....	--	*601	*4,676	129,128	54,883	--	--	*749
Apparel manufacturing.....	--	*78,688	*1,788	204,782	*96,498	*53	*9,614	*4,185
Wood product manufacturing.....	--	*1,129	--	*44,725	*12,541	--	--	--
Paper manufacturing.....	--	15,700	*43,218	782,845	255,978	*5	*10,500	*6,389
Printing and related support activities.....	--	*18,342	--	*20,196	*18,052	*139	*1,186	*11,631
Petroleum and coal products manufacturing.....	13,143,975	9,138,087	*472,640	15,173,345	13,077,655	*11,673	*267,487	*108,026
Chemical manufacturing.....	*1,468,839	3,679,394	863,944	13,978,033	6,824,075	*5,675	*118,692	225,808
Pharmaceutical and medicine manufacturing.....	--	1,307,237	*444,041	5,631,939	2,728,037	--	*105,265	*73,258
Other chemical manufacturing.....	*1,468,839	2,372,157	419,903	8,346,094	4,096,038	*5,675	13,426	152,550
Plastics and rubber products manufacturing.....	--	103,107	*10,840	656,252	374,152	*4,132	*13,424	*1,409
Nonmetallic mineral product manufacturing.....	--	*4,560	*10,622	242,564	96,769	*31	*887	*3,157
Primary metal manufacturing.....	--	*264,854	*58,910	973,901	494,850	*121,368	*7,550	*2,065
Fabricated metal product manufacturing.....	--	397,529	*18,956	1,273,011	813,211	*1,592	*5,872	*96,646
Machinery manufacturing.....	--	742,583	251,551	5,770,124	2,672,733	*1,109	85,721	80,081
Computer and electronic products.....	--	1,709,617	3,578,401	15,481,479	5,189,318	*1,465	73,520	122,762
Electrical equipment, appliance, and component.....	--	498,120	*2,232,646	6,832,694	4,028,830	*1,956	*35,171	*24,959
Transportation equipment manufacturing.....	--	1,654,108	*448,384	6,444,599	3,207,770	*55,623	*190,840	*530,726
Motor vehicles and equipment.....	--	1,240,572	*374,463	3,767,925	1,106,826	*14,252	*8,867	*1,902
Other transportation equipment manufacturing.....	--	*413,536	*73,920	2,676,674	2,100,944	*41,371	*181,973	*528,824
Furniture and related products.....	--	*19,346	*4,683	57,699	*29,314	--	*865	--
Miscellaneous manufacturing and manufacturing not allocable.....	--	187,264	*142,474	1,686,354	996,557	*17,998	142,860	*4,894
Wholesale and retail trade.....	*111,489	1,682,666	*65,874	4,151,614	2,682,751	4,979	348,695	286,624
Wholesale trade.....	*111,489	789,497	*63,685	2,892,810	1,880,720	3,499	246,151	105,017
Durable goods.....	--	131,553	*616	796,074	430,400	*1,589	193,405	52,668
Nondurable goods.....	*111,489	657,944	*63,069	2,096,736	1,450,320	*1,910	52,746	52,348
Drugs, chemicals, and allied products.....	--	*55,212	*14,994	*213,268	*181,022	--	--	*8,835
Petroleum and petroleum products.....	--	*13,972	--	*46,680	*43,152	*1,290	*27,516	*3,481
Other miscellaneous wholesale trade.....	*111,489	*3,608	--	*229,037	*126,842	--	*209	*767
Other nondurable goods.....	--	585,153	*48,075	1,607,751	1,099,304	*620	*25,021	*39,266

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1a.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by NAICS Classification)--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued							
	Gross income (less loss)--Continued			Deductions				
	Oil and gas extraction income (less loss) ⁴	Foreign branch income ⁴	Specifically allocable income [section 863(b)] ⁴	Total	Deductions allocable to specific types of income			Service expenses
					Total	Depreciation, depletion, and amortization	Rental, royalty, and licensing expenses Other	
(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)	
Retail trade.....	--	893,169	*2,189	1,258,804	802,031	*1,480	102,544	*181,608
Motor vehicle and parts dealers.....	--	--	--	--	--	--	--	--
Food and beverage stores.....	--	--	--	*3,751	*3,503	--	*2,595	--
Clothing and clothing accessories stores.....	--	*227,122	--	311,800	248,324	*1,057	*86,339	--
General merchandise stores.....	--	*284,521	--	*436,750	*333,455	*369	--	*88,917
All other retail stores.....	--	*381,526	*2,189	506,503	216,749	*54	*13,610	*92,691
Transportation and warehousing.....	--	4,724,738	*3,128	8,035,750	7,795,999	*1,503	*4,649	5,510,783
Transportation.....	--	4,724,738	*3,128	8,034,679	7,795,597	*1,503	*4,649	5,510,783
Water transportation.....	--	*25,300	--	*108,465	*84,749	*333	*1,758	*82,001
All other transportation.....	--	4,699,438	*3,128	7,926,213	7,710,848	*1,169	*2,891	5,428,782
Warehousing and storage.....	--	--	--	*1,071	*402	--	*(²)	--
Information.....	--	3,054,897	*243,296	19,911,938	12,634,227	232,406	2,283,489	1,282,885
Publishing industries.....	--	1,904,993	*100,718	10,784,713	4,871,963	*366	205,085	*86,524
Motion picture and sound recording industries.....	--	*9,740	--	884,778	734,423	*13,707	*149,554	*10,344
Broadcasting and telecommunications.....	--	*617,803	*142,579	6,876,400	5,913,584	*212,896	*1,928,850	*220,553
Broadcasting.....	--	*10,119	*142,579	*3,006,315	*2,484,485	*212,230	*1,925,621	*100
Telecommunications.....	--	*607,683	--	3,870,085	3,429,098	*665	*3,229	*220,452
Information and data processing services.....	--	*522,362	--	1,366,047	1,114,258	*5,438	--	*965,464
Finance, insurance, and real estate.....	--	15,943,921	*144	36,408,313	17,775,632	266,215	700,719	1,368,707
Finance and insurance.....	--	15,915,658	*144	36,320,336	17,710,461	260,871	679,460	1,339,714
Depository credit intermediation.....	--	--	--	173,558	*9,639	--	*3	*3,232
Nondepository credit intermediation.....	--	*2,304,032	--	7,377,832	5,423,519	*64,021	*2,736	*404,496
Securities, commodity contracts, etc.....	--	4,343,440	*144	14,361,469	4,511,756	*150,588	448,697	*196,687
Insurance carriers and related activities.....	--	9,218,616	--	14,352,225	7,710,406	*45,630	228,023	723,088
Other finance and insurance.....	--	*49,570	--	*55,253	*55,141	*632	--	*12,210
Real estate and rental and leasing.....	--	*28,264	--	87,976	65,172	*5,344	21,259	*28,993
Services.....	*20,542	37,879,859	*520,856	52,402,896	21,383,528	452,113	1,001,519	*2,429,227
Professional, scientific, and technical services.....	--	2,291,696	*512,590	5,226,906	4,488,326	13,765	514,651	*1,757,229
Management of companies (holding companies).....	*20,542	33,985,663	--	44,446,560	14,927,773	428,581	349,480	*187,439
Educational, health care, and social assistance.....	--	*6,801	*4,707	102,557	81,226	*672	*3,105	*48,129
Arts, entertainment, and recreation.....	--	*155,495	--	*367,160	*294,946	*18	*70,495	*222,708
Accommodation and food services.....	--	*1,301,150	*350	1,676,414	1,226,056	*1301	8,843	*8,206
Other services.....	--	139,053	*3,210	583,298	365,201	*7,775	54,946	205,515

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1a.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by NAICS Classification)--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued							
	Deductions--Continued						Taxable income (less loss) before adjustments	Adjustments to taxable income
	Other deductions allocable to specific types of income	Deductions not allocable to specific types of income				Deductions from oil and gas extraction income ⁵		
		Total	Research and development	Interest	Other			
(31)	(32)	(33)	(34)	(35)	(36)	(37)	(38)	
All industries.....	87,584,590	94,247,133	9,876,318	49,478,293	32,808,117	9,369,404	147,116,869	10,480,879
Agriculture, forestry, fishing, and hunting.....	*70,947	*47,851	*24,454	*10,035	*10,090	--	170,965	*4,916
Mining.....	1,673,301	839,572	*54,061	295,441	463,133	*178,756	2,066,788	173,296
Metal mining.....	*143,590	*75,076	--	*35,278	*39,798	*178,756	258,950	*42,211
Coal mining.....	*48,698	*14,507	--	*12,044	--	--	*47,940	--
Oil and gas extraction.....	*905,383	*232,596	*1,292	*130,821	*100,482	--	*454,359	*12,433
Nonmetallic minerals, except fuels.....	575,630	517,394	*52,769	117,299	322,853	--	1,305,540	*118,652
Utilities.....	563,072	644,273	*398	597,950	*45,543	*52	2,077,689	*169,861
Construction.....	77,058	45,019	*415	*8,334	*23,061	--	177,070	20,882
General building contractors.....	*15,176	*2,026	--	*1,342	*644	--	94,470	*531
Heavy construction contractors.....	*4,808	*25,786	*144	*3,348	*21,304	--	49,401	*15,170
Special trade contractors.....	*50,485	*17,207	*271	*3,644	*1,113	--	30,037	*5,181
Manufacturing.....	39,069,409	33,984,654	7,230,395	12,813,048	13,585,976	9,069,121	91,703,034	3,963,115
Food manufacturing.....	1,490,929	843,769	53,048	538,037	235,427	--	3,623,042	203,275
Beverage and tobacco product manufacturing.....	1,745,788	*1,632,339	*53,142	*404,087	*1,117,361	--	6,934,825	*248,755
Beverage manufactures.....	*151,240	*932,047	--	*156,458	*717,840	--	2,991,175	*248,755
Tobacco manufactures.....	*1,594,548	*700,292	*53,142	*247,629	*399,521	--	*3,943,650	--
Textile mill and textile products mills.....	*54,134	74,245	*12,147	*53,556	*7,378	--	89,164	*19,713
Apparel manufacturing.....	*82,646	108,283	*306	*84,865	*17,779	--	628,302	*130,620
Wood product manufacturing.....	*12,541	*32,184	*130	*17,174	*14,880	--	42,078	--
Paper manufacturing.....	239,083	526,868	107,834	118,510	291,444	--	1,626,115	*5,123
Printing and related support activities.....	*5,096	*2,143	*1,039	*276	*747	--	35,803	*1,099
Petroleum and coal products manufacturing.....	12,690,469	2,095,690	130,764	1,502,739	458,624	8,648,926	12,768,311	70,859
Chemical manufacturing.....	6,473,900	7,153,959	1,597,673	2,724,054	2,763,512	*420,195	18,434,706	476,368
Pharmaceutical and medicine manufacturing.....	2,549,513	2,903,902	652,590	729,552	1,472,465	--	9,072,119	*4,108
Other chemical manufacturing.....	3,924,387	4,250,056	945,083	1,994,502	1,291,047	*420,195	9,362,590	472,260
Plastics and rubber products manufacturing.....	355,188	282,101	81,314	110,785	78,159	--	1,045,309	26,004
Nonmetallic mineral product manufacturing.....	92,694	145,795	*35,209	81,140	*24,355	--	579,520	*148,350
Primary metal manufacturing.....	363,867	479,051	*43,018	269,352	163,192	--	1,047,167	*14,722
Fabricated metal product manufacturing.....	709,101	459,800	55,526	160,635	239,560	--	1,815,179	24,692
Machinery manufacturing.....	2,505,822	3,097,391	476,151	968,950	1,574,716	--	6,887,947	185,513
Computer and electronic products.....	4,991,571	10,292,161	3,621,416	1,168,228	5,476,204	--	20,594,225	2,033,301
Electrical equipment, appliance, and component.....	3,966,744	2,803,864	111,181	2,317,307	367,557	--	4,686,876	16,019
Transportation equipment manufacturing.....	2,430,581	3,236,829	703,182	2,066,854	437,672	--	9,450,656	196,345
Motor vehicles and equipment.....	1,081,806	2,661,100	552,662	1,846,307	240,583	--	7,726,354	32,922
Other transportation equipment manufacturing.....	1,348,776	575,730	*150,520	220,547	*197,090	--	1,724,302	*163,423
Furniture and related products.....	*28,449	*28,385	*742	*23,221	*4,422	--	164,564	*3,387
Miscellaneous manufacturing and manufacturing not allocable.....	830,806	689,797	146,573	203,278	312,984	--	1,249,244	158,969
Wholesale and retail trade.....	2,042,453	1,468,863	32,916	595,729	786,058	*110,976	4,855,818	565,245
Wholesale trade.....	1,526,054	1,012,089	25,935	467,718	479,698	*110,976	2,812,759	315,094
Durable goods.....	182,738	365,674	15,168	156,436	171,400	--	480,093	43,005
Nondurable goods.....	1,343,316	646,415	10,767	311,282	308,298	*110,976	2,332,666	272,089
Drugs, chemicals, and allied products.....	*172,187	*32,246	*3,030	*17,110	*10,484	--	*194,711	*52
Petroleum and petroleum products.....	*10,865	*3,527	--	*211	--	--	22,598	--
Other miscellaneous wholesale trade.....	*125,866	*102,195	--	*2,140	*100,055	*110,976	104,272	*616
Other nondurable goods.....	1,034,397	508,447	7,736	291,820	197,759	--	2,011,086	271,421

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1a.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by NAICS Classification)--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued								
	Deductions--Continued						Deductions from oil and gas extraction income ⁵	Taxable income (less loss) before adjustments	Adjustments to taxable income
	Other deductions allocable to specific types of income	Deductions not allocable to specific types of income							
		Total	Research and development	Interest	Other				
(31)	(32)	(33)	(34)	(35)	(36)	(37)	(38)		
Retail trade.....	516,399	456,774	*6,981	128,010	306,360	--	2,043,059	250,151	
Motor vehicle and parts dealers.....	--	--	--	--	--	--	*1,164	--	
Food and beverage stores.....	*907	*249	--	*230	--	--	*70,221	*34,959	
Clothing and clothing accessories stores.....	*160,928	63,477	*416	*54,726	*7,880	--	1,014,150	*146,159	
General merchandise stores.....	*244,170	*103,295	*10	*53,386	*49,899	--	*277,391	*25,047	
All other retail stores.....	110,394	289,753	*6,555	19,669	248,581	--	680,132	*43,986	
Transportation and warehousing.....	2,279,064	239,751	*17,961	89,798	129,211	--	1,051,003	14,909	
Transportation.....	2,278,662	239,081	*17,961	89,128	129,211	--	1,048,488	14,909	
Water transportation.....	*657	*23,716	--	*15,540	*6,749	--	201,149	*13,293	
All other transportation.....	2,278,005	215,365	*17,961	73,588	122,462	--	847,339	*1,616	
Warehousing and storage.....	*401	*670	--	*670	--	--	*2,515	--	
Information.....	8,835,447	7,277,711	2,140,229	997,890	4,055,860	--	11,290,825	3,462,969	
Publishing industries.....	4,579,988	5,912,750	1,972,015	202,053	3,665,721	--	5,919,284	3,086,388	
Motion picture and sound recording industries.....	*560,818	150,355	--	*126,901	*16,278	--	1,175,231	*115,449	
Broadcasting and telecommunications.....	*3,551,285	*962,816	*76,352	*612,784	*270,767	--	3,308,751	*234,458	
Broadcasting.....	*346,534	*521,829	*15,162	*291,450	*215,217	--	970,955	*233,724	
Telecommunications.....	*3,204,752	*440,987	*61,190	*321,334	*55,550	--	2,337,796	*734	
Information and data processing services.....	*143,355	251,790	*91,862	56,151	*103,094	--	887,559	*26,674	
Finance, insurance, and real estate.....	15,439,991	18,632,680	*55,721	11,746,321	6,139,091	--	18,729,319	1,775,390	
Finance and insurance.....	15,430,416	18,609,876	*55,721	11,729,928	6,132,679	--	18,664,189	1,761,149	
Depository credit intermediation.....	*6,403	*163,919	--	*117,449	*42,735	--	37,652	*894	
Nondepository credit intermediation.....	*4,952,265	1,954,313	*46,561	*1,047,569	*552,690	--	1,177,855	*17,158	
Securities, commodity contracts, etc.....	3,715,784	9,849,713	*4,865	9,245,909	525,685	--	6,995,515	1,082,667	
Insurance carriers and related activities.....	6,713,664	6,641,819	*4,296	1,318,890	5,011,569	--	10,440,870	656,635	
Other finance and insurance.....	*42,299	*111	--	*111	*(2)	--	*12,297	*3,794	
Real estate and rental and leasing.....	9,575	*22,805	--	*16,393	*6,412	--	65,130	*14,241	
Services.....	17,500,670	31,019,368	319,766	22,277,952	7,568,575	--	14,879,407	325,967	
Professional, scientific, and technical services.....	2,202,681	738,580	126,778	106,662	466,476	--	2,234,275	235,946	
Management of companies (holding companies).....	13,962,273	29,518,787	*184,617	21,730,863	6,827,693	--	10,499,962	3,879	
Educational, health care, and social assistance.....	*29,321	*21,331	--	*9,024	*11,568	--	138,515	*17,802	
Arts, entertainment, and recreation.....	*1,724	*72,215	*4,653	*20,315	*36,199	--	192,540	*18,737	
Accommodation and food services.....	1,207,706	450,357	--	*259,545	*176,321	--	1,227,769	*15,947	
Other services.....	96,965	218,097	*3,718	151,542	50,318	--	586,345	33,658	

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1a.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by NAICS Classification)--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued							
	Taxable income (less loss) after adjustments	Foreign taxes available for credit					Paid or accrued	
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Total	Taxes withheld at source on dividends	
								(39)
All industries.....	136,635,990	47,575,987	2,476,970	9,368,659	40,684,298	13,608,822	2,193,964	
Agriculture, forestry, fishing, and hunting.....	166,049	63,034	--	*2,694	60,340	16,414	1,798	
Mining.....	1,893,492	1,022,018	*320,756	578,481	764,294	646,320	12,727	
Metal mining.....	216,739	196,018	*301,304	*353,777	143,545	126,630	*6	
Coal mining.....	*47,940	*13,148	--	*224	*12,924	*12,815	*(²)	
Oil and gas extraction.....	*441,925	*486,855	*12,254	*191,385	*307,724	*294,560	*7019	
Nonmetallic minerals, except fuels.....	1,186,888	325,996	*7,199	33,095	300,100	212,314	*5,702	
Utilities.....	1,907,828	797,846	*1,523	46,727	752,642	163,985	50,815	
Construction.....	156,188	67,637	--	10,919	56,718	25,220	651	
General building contractors.....	93,939	41,009	--	*7,709	33,300	8,470	463	
Heavy construction contractors.....	34,231	12,976	--	*1,095	11,881	9,760	*54	
Special trade contractors.....	24,856	12,314	--	*2,116	10,199	5,652	*128	
Manufacturing.....	87,739,919	33,251,300	2,151,029	7,255,155	28,147,174	7,011,736	1,651,031	
Food manufacturing.....	3,419,767	1,367,528	--	137,210	1,230,317	183,742	82,398	
Beverage and tobacco product manufacturing.....	6,686,070	2,029,453	--	*7,558	2,021,894	403,673	*108,751	
Beverage manufactures.....	2,742,420	806,135	--	*708	805,427	266,909	*48,076	
Tobacco manufactures.....	*3,943,650	*1,223,318	--	*6,850	*1,216,467	*136,764	*60,676	
Textile mill and textile products mills.....	69,452	22,655	--	4,912	17,743	3,395	*923	
Apparel manufacturing.....	497,682	191,413	--	*855	190,558	32,074	*11,939	
Wood product manufacturing.....	42,078	7,750	--	*396	7,354	5,029	*190	
Paper manufacturing.....	1,620,992	607,118	--	31,900	575,218	89,523	33,985	
Printing and related support activities.....	34,704	4,227	--	*1,313	2,914	1,491	*29	
Petroleum and coal products manufacturing.....	12,697,452	6,752,874	2,125,749	3,980,754	4,897,869	2,004,548	220,546	
Chemical manufacturing.....	17,958,337	6,808,021	*21,494	627,490	6,202,026	1,123,788	331,279	
Pharmaceutical and medicine manufacturing.....	9,068,008	3,254,996	*17	336,259	2,918,754	382,560	171,901	
Other chemical manufacturing.....	8,890,329	3,553,026	*21,477	291,230	3,283,272	741,228	159,378	
Plastics and rubber products manufacturing.....	1,019,305	428,606	--	27,874	400,731	56,759	27,550	
Nonmetallic mineral product manufacturing.....	431,170	272,175	--	51,357	220,818	17,648	*6,037	
Primary metal manufacturing.....	1,032,445	457,831	*2,608	126,281	334,158	76,083	*15,877	
Fabricated metal product manufacturing.....	1,790,488	787,011	--	178,283	608,728	90,709	43,390	
Machinery manufacturing.....	6,702,434	2,223,502	*1,155	78,776	2,145,880	571,511	226,512	
Computer and electronic products.....	18,560,923	5,690,032	*23	1,802,487	3,887,568	1,191,072	246,074	
Electrical equipment, appliance, and component.....	4,670,856	1,963,485	--	9,957	1,953,527	564,088	15,924	
Transportation equipment manufacturing.....	9,254,311	3,196,787	--	143,374	3,053,413	525,490	255,621	
Motor vehicles and equipment.....	7,693,432	2,866,108	--	131,152	2,734,957	426,467	236,378	
Other transportation equipment manufacturing.....	1,560,879	330,678	--	*12,222	318,456	99,023	19,243	
Furniture and related products.....	161,177	70,349	--	*15,360	54,989	4,939	*3,635	
Miscellaneous manufacturing and manufacturing not allocable.....	1,090,275	370,485	--	29,016	341,469	66,175	20,369	
Wholesale and retail trade.....	4,290,573	1,554,476	*137	361,988	1,192,625	445,015	102,024	
Wholesale trade.....	2,497,666	959,780	*137	208,193	751,724	246,840	92,815	
Durable goods.....	437,089	132,170	--	15,779	116,391	31,966	7,739	
Nondurable goods.....	2,060,577	827,610	*137	192,414	635,333	214,874	85,076	
Drugs, chemicals, and allied products.....	*194,658	*50,271	--	*105	*50,166	*11,642	*4,196	
Petroleum and petroleum products.....	22,598	3,505	--	*488	3,017	2,995	*189	
Other miscellaneous wholesale trade.....	103,655	104,945	*137	*46,332	58,750	5,146	*2,971	
Other nondurable goods.....	1,739,665	668,889	--	145,489	523,400	195,091	77,720	

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1a.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by NAICS Classification)--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued						
	Taxable income (less loss) after adjustments	Foreign taxes available for credit				Paid or accrued	
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Total	Taxes withheld at source on dividends
	(39)	(40)	(41)	(42)	(43)	(44)	(45)
Retail trade.....	1,792,908	594,696	--	153,795	440,901	198,175	9,209
Motor vehicle and parts dealers.....	*1,164	*118	--	*2	*116	*116	*2
Food and beverage stores.....	*35,262	*10,268	--	*2,758	*7,510	*7,510	*2
Clothing and clothing accessories stores.....	867,991	311,970	--	*80,511	231,459	39,596	*2,249
General merchandise stores.....	*252,344	*98,807	--	*56,079	*42,728	*32,108	*6,686
All other retail stores.....	636,146	173,533	--	14,444	159,089	118,845	271
Transportation and warehousing.....	1,036,094	188,793	--	13,159	175,634	111,160	3,926
Transportation.....	1,033,579	187,780	--	12,767	175,013	110,989	3,919
Water transportation.....	187,856	86,009	--	*1,876	84,133	*67,072	*1,060
All other transportation.....	845,723	101,771	--	10,891	90,880	43,916	2,859
Warehousing and storage.....	*2,515	*1,014	--	*392	*621	*171	*7
Information.....	7,827,856	2,768,786	*508	307,774	2,461,519	1,186,527	99,077
Publishing industries.....	2,832,896	1,429,423	*508	38,997	1,390,934	899,259	47,741
Motion picture and sound recording industries.....	1,059,782	217,946	--	*58,393	159,553	40,290	*3,715
Broadcasting and telecommunications.....	3,074,293	850,278	--	*201,136	649,142	203,160	*32,283
Broadcasting.....	737,231	410,520	--	*122,857	287,663	122,069	*4,312
Telecommunications.....	2,337,062	439,758	--	*78,279	361,478	81,092	*27,972
Information and data processing services.....	860,885	271,139	--	*9,249	261,891	43,817	*15,338
Finance, insurance, and real estate.....	16,953,929	3,343,076	--	241,484	3,101,592	1,730,942	131,904
Finance and insurance.....	16,903,040	3,307,725	--	228,303	3,079,421	1,716,109	131,652
Depository credit intermediation.....	36,758	8,157	--	*623	7,534	7,510	204
Nondepository credit intermediation.....	1,160,697	229,606	--	*18,718	210,889	169,182	*17,627
Securities, commodity contracts, etc.....	5,912,848	1,536,384	--	66,080	1,470,304	673,732	30,095
Insurance carriers and related activities.....	9,784,235	1,531,736	--	142,882	1,388,854	863,843	83,723
Other finance and insurance.....	*8,503	*1,841	--	*(²)	*1,841	*1,841	*3
Real estate and rental and leasing.....	50,889	35,351	--	13,180	22,170	14,833	251
Services.....	14,553,440	4,470,585	*2,326	550,156	3,922,755	2,269,990	139,713
Professional, scientific, and technical services.....	1,998,330	532,482	--	111,356	421,126	240,551	10,758
Management of companies (holding companies).....	10,496,083	3,076,607	*2,326	245,552	2,833,380	1,762,437	94,263
Educational, health care, and social assistance.....	120,714	43,012	--	*14,954	28,059	5,571	*664
Arts, entertainment, and recreation.....	173,804	62,406	--	*7,839	54,567	34,770	*6,858
Accommodation and food services.....	1,211,822	526,203	--	135,282	390,920	183,666	*11,937
Other services.....	552,687	229,875	--	35,173	194,702	42,996	15,233

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1a.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by NAICS Classification)--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued						Taxes deemed paid
	Foreign taxes available for credit--Continued						
	Paid or accrued--Continued						
	Taxes withheld at source on--		Other taxes paid or accrued on--				
Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income		
(46)	(47)	(48)	(49)	(50)	(51)	(52)	
All industries.....	784,126	2,213,430	4,861,563	8,524	387,240	3,159,976	27,075,476
Agriculture, forestry, fishing, and hunting.....	*965	*3,047	*8,276	--	*21	*2,307	*43,927
Mining.....	10,429	15,307	256,348	--	25,385	326,124	117,974
Metal mining.....	*588	*25	*459	--	*995	124,557	*16,915
Coal mining.....	*1,591	--	*11,224	--	--	--	*109
Oil and gas extraction.....	*5,178	*2,183	*108,420	--	*1424	*170,336	*13,164
Nonmetallic minerals, except fuels.....	3,072	13,099	*136,245	--	*22,966	31,230	87,786
Utilities.....	*13,334	--	*2,275	--	*2,521	*95,040	588,656
Construction.....	*553	1,240	*3,023	--	8,328	11,426	*31,498
General building contractors.....	*286	*462	*2,316	--	*4,037	*906	*24,831
Heavy construction contractors.....	*9	*595	*38	--	*1,729	*7,334	*2,121
Special trade contractors.....	*258	*183	*668	--	*1,286	*3,129	*4,546
Manufacturing.....	153,943	1,408,089	1,877,298	2,726	118,969	1,799,680	21,135,438
Food manufacturing.....	5,004	44,341	21,504	--	*5,322	25,172	1,046,576
Beverage and tobacco product manufacturing.....	*6,686	*110,645	*161,990	*642	*872	*14,085	*1,618,222
Beverage manufactures.....	*6,680	*47,158	*150,530	*642	*872	*12,952	*538,518
Tobacco manufactures.....	*7	*63,488	*11,460	--	--	*11,333	*1,079,703
Textile mill and textile products mills.....	*510	*1,431	*306	*74	*64	*87	14,348
Apparel manufacturing.....	*75	15,229	*4,559	--	*155	*117	158,483
Wood product manufacturing.....	*772	*382	*3,110	--	--	*575	*2,325
Paper manufacturing.....	2,551	27,166	*25,274	--	*243	*303	485,695
Printing and related support activities.....	*68	*1,272	--	--	*88	*33	*1,423
Petroleum and coal products manufacturing.....	34,839	8,285	*935,966	--	*481	804,431	2,893,321
Chemical manufacturing.....	25,951	235,135	254,805	*762	19,662	256,194	5,078,238
Pharmaceutical and medicine manufacturing.....	9,915	75,079	88,558	*558	*5446	31,103	2,536,194
Other chemical manufacturing.....	16,036	160,057	166,247	*203	14,216	225,090	2,542,044
Plastics and rubber products manufacturing.....	1,743	19,355	*7,115	--	*703	*293	343,973
Nonmetallic mineral product manufacturing.....	240	4,808	*661	--	*3,102	*2,801	203,170
Primary metal manufacturing.....	4,500	*3,990	*19,477	--	*217	32,023	258,075
Fabricated metal product manufacturing.....	2,825	9,512	11,070	*5	*1,134	22,773	518,019
Machinery manufacturing.....	12,209	68,781	200,559	*54	24,311	39,085	1,574,369
Computer and electronic products.....	13,418	716,001	128,288	*286	15,055	71,951	2,696,496
Electrical equipment, appliance, and component.....	27,218	13,320	6,075	*883	*476	500,191	1,389,440
Transportation equipment manufacturing.....	12,559	105,340	81,090	*16	*46,414	24,450	2,527,923
Motor vehicles and equipment.....	10,572	80,109	*48,407	*9	*29,737	*21,255	2,308,489
Other transportation equipment manufacturing.....	*1,987	25,231	*32,683	*8	*16,676	*3,195	219,434
Furniture and related products.....	*538	457	*186	--	--	*123	*50,050
Miscellaneous manufacturing and manufacturing not allocable.....	2,235	22,639	15,265	*4	*670	4,994	275,293
Wholesale and retail trade.....	15,176	80,222	199,476	*259	8,526	39,332	747,611
Wholesale trade.....	14,239	23,242	91,143	*259	7,613	17,528	504,884
Durable goods.....	5,208	3,746	7,433	*259	1,073	6,508	84,425
Nondurable goods.....	9,031	19,496	83,710	--	6,540	11,020	420,459
Drugs, chemicals, and allied products.....	*161	*3,415	*3,018	--	*500	*352	*38,524
Petroleum and petroleum products.....	*1,061	*484	*555	--	*361	*345	*22
Other miscellaneous wholesale trade.....	*257	*229	*993	--	*315	*382	*53,604
Other nondurable goods.....	7,552	15,369	79,144	--	*5,363	9,942	328,308

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1a.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by NAICS Classification)--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued						Taxes deemed paid
	Foreign taxes available for credit--Continued						
	Paid or accrued--Continued						
	Taxes withheld at source on--		Other taxes paid or accrued on--				
Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income		
(46)	(47)	(48)	(49)	(50)	(51)	(52)	
Retail trade.....	937	56,980	108,333	--	*912	21,804	242,727
Motor vehicle and parts dealers.....	*27	*80	--	--	--	*6	--
Food and beverage stores.....	*270	*7,238	--	--	--	*(2)	--
Clothing and clothing accessories stores.....	*144	3,462	*15,393	--	--	*18,348	*191,863
General merchandise stores.....	*163	*7,873	*15,103	--	*59	*2,224	*10,620
All other retail stores.....	*332	38,327	*77,837	--	*853	*1,225	40,244
Transportation and warehousing.....	3,827	*3,173	27,677	*590	70,671	*1294	64,475
Transportation.....	3,664	*3,173	27,677	*590	70,671	*1294	64,024
Water transportation.....	*102	--	*8	--	*65,744	*157	*17,060
All other transportation.....	3,562	*3,173	*27,669	*590	4,927	*1,137	46,964
Warehousing and storage.....	*164	--	--	--	--	--	*450
Information.....	8,481	566,532	333,290	*2,161	22,774	154,212	1,274,993
Publishing industries.....	1,020	431,250	296,357	*2,161	*6,091	114,639	491,674
Motion picture and sound recording industries.....	--	7,580	*2,571	--	*13	*26,410	*119,264
Broadcasting and telecommunications.....	*6,002	117,077	*32,929	--	*2,745	12,125	*445,981
Broadcasting.....	*771	*110,847	--	--	*76	*6,063	*165,595
Telecommunications.....	*5,230	*6,230	*32,929	--	*2,669	*6,061	*280,387
Information and data processing services.....	*1,459	*10,625	*1,433	--	13,924	*1,039	*218,073
Finance, insurance, and real estate.....	362,150	21,930	661,282	*64	43,908	509,705	1,370,650
Finance and insurance.....	361,750	17,217	654,171	*64	41,974	509,281	1,363,312
Depository credit intermediation.....	*7,037	*47	*129	--	*94	*(2)	*24
Nondepository credit intermediation.....	*5,921	*11,720	*128,526	--	*4,377	*1,011	*41,706
Securities, commodity contracts, etc.....	151,174	2,717	202,500	--	*6,258	280,989	796,571
Insurance carriers and related activities.....	197,619	2,608	321,825	*64	31,245	226,759	525,011
Other finance and insurance.....	--	*125	*1,191	--	--	*521	--
Real estate and rental and leasing.....	400	4,713	*7,111	--	*1,934	424	*7,337
Services.....	215,244	113,889	1,491,927	*2,724	86,138	220,357	1,652,764
Professional, scientific, and technical services.....	363	38,978	122,882	*2,724	51,410	13,436	180,575
Management of companies (holding companies).....	206,343	3,823	1,260,657	--	*8,591	188,759	1,070,944
Educational, health care, and social assistance.....	*7	*3,327	*106	--	*1,390	*76	*22,488
Arts, entertainment, and recreation.....	*27	*3,567	*543	--	*11,515	*12,259	*19,798
Accommodation and food services.....	6,491	57,494	*96,502	--	*7,420	*3,821	*207,254
Other services.....	2,013	6,698	*11,235	--	5,811	2,005	151,705

Footnotes on next page.

Corporate Foreign Tax Credit, 1998

Footnotes and Notes to Table 1:

* Data should be used with caution because of the small number of 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 26-35. 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 52 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 36 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 36, respectively) are contained in the summary columns (i.e., columns 16 through 22 and 26 through 35), 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. Code section 863(b) income (income partly within and partly without the United States) and foreign branch income are also included in the summary amounts reported in columns 16 through 22 and are also reported separately (on Schedule F) in columns 24 and 25. Total deductions not allocable to specific types of income (column 32) are equal to the sum of columns 33 through 35 (any differences are due to taxpayer reporting practices). Total foreign-source gross income (column 16) less total foreign deductions (column 26) is equal to foreign-source taxable income before adjustments (column 37).

Adjustments to foreign-source taxable income (reported in column 38) 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 after adjustments (the numerator of the limitation fraction) is reported in column 39. 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 40 through 52. 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 43 through 52. Total foreign taxes paid or accrued (column 44) are the sum of columns 45 through 51 (any differences are due to taxpayer reporting practices). Total foreign taxes paid, accrued, and deemed paid (column 43) are equal to the sum of total taxes paid or accrued (column 44) and taxes deemed paid (column 52). 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 41, as well as carryovers of foreign taxes not credited in prior years, which are reported in column 42. Thus, total foreign taxes available for credit (column 40) are equal to total foreign taxes paid, accrued, and deemed paid (column 43) less certain foreign taxes (column 41), plus any carryover of prior-year foreign taxes (column 42).

Corporate Foreign Tax Credit, 1998

Table 1b.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by SIC Classification)

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

Major and selected minor industrial group	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 resulting from foreign taxes deemed paid (gross-up)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All industries.....	5,927	15,174,244,548	5,367,522,238	35,296,572	19,520	22,187,348	27,092,409
Agriculture, forestry, and fishing.....	107	3,584,855	4,283,187	*21,820	--	*16,116	*42,782
Mining.....	164	95,033,214	38,818,332	151,192	--	208,842	112,335
Metal mining.....	10	9,300,850	4,801,377	*9,271	--	*364	*3,097
Coal mining.....	6	*20,175,491	*5,866,352	*23	--	*3,777	*997
Oil and gas extraction.....	85	60,386,800	23,660,962	114,481	--	204,701	91,239
Nonmetallic minerals, except fuels.....	12	5,154,412	4,343,023	*27,324	--	--	*17,001
Construction.....	220	16,101,731	24,358,101	28,843	--	*36,305	32,630
General building contractors.....	126	9,218,346	17,733,227	16,821	--	*36,243	*25,963
Heavy construction contractors.....	27	5,550,593	4,646,661	*3,843	--	*62	*2,121
Special trade contractors.....	56	1,253,496	1,943,057	*8,179	--	--	*4,546
Manufacturing.....	1,634	4,074,287,782	2,513,671,091	27,469,828	19,520	15,129,035	21,506,856
Food and kindred products.....	71	353,657,639	175,764,299	2,847,837	*66	830,700	1,649,484
Tobacco manufactures.....	5	*88,665,073	*51,913,650	*1,236,016	--	*1,124,323	*1,114,659
Textile mill products.....	22	11,870,499	12,293,698	4,626	--	*23,742	7,789
Apparel and other textile products.....	53	18,424,587	21,376,534	217,837	*31	*89,734	164,313
Lumber and wood products.....	17	29,986,598	19,803,825	*5,588	--	*53,881	*2,626
Furniture and fixtures.....	14	11,610,561	13,037,164	*69,458	--	*61,170	*56,395
Paper and allied products.....	30	61,031,956	46,285,844	538,600	--	156,636	481,273
Printing and publishing.....	93	134,492,655	67,963,111	235,049	*21	*71,460	110,460
Industrial plastics and synthetic material.....	97	305,936,905	133,137,526	1,987,913	*9,441	876,131	1,323,133
Drugs.....	56	216,278,719	143,789,492	2,358,108	*1,026	2,059,262	2,505,855
Other chemicals.....	104	97,365,661	103,823,860	1,693,801	*767	550,540	1,215,054
Petroleum (including integrated) and coal products.....	22	506,570,319	298,995,959	5,041,934	--	1,081,502	2,921,797
Rubber and miscellaneous plastics products.....	88	25,829,173	29,214,531	429,188	*602	39,963	327,859
Leather and leather products.....	9	*2,194,565	*32,203,85	*4,980	--	*3,314	*3,713
Stone, clay, and glass products.....	30	29,803,155	22,894,144	226,221	--	*29,811	150,926
Primary metal industries.....	41	91,274,273	70,649,912	459,780	--	269,497	318,929
Fabricated metal products.....	140	70,917,190	55,993,377	679,729	*1,063	312,468	498,800
Office, computing, and accounting equipment.....	24	93,773,312	97,550,552	1,923,365	--	460,842	1,369,173
Other machinery, except electrical.....	219	122,170,287	122,804,163	2,741,364	*3,094	707,255	1,466,680
Electrical and electronic equipment.....	185	754,441,654	355,341,773	1,486,283	*656	2,623,823	2,358,487
Motor vehicles and equipment.....	41	733,451,305	373,844,864	2,416,266	--	2,286,353	2,305,503
Transportation equipment, except motor vehicles.....	46	151,779,874	152,092,506	328,819	*537	234,973	237,186
Instruments and related products.....	109	128,059,480	109,163,444	281,467	*1,347	1,084,584	767,287
Miscellaneous manufacturing and manufacturing not allocable.....	69	30,498,856	27,238,220	249,579	*850	85,277	145,874
Transportation and public utilities.....	160	672,935,385	366,206,189	1,639,361	--	1,180,148	1,145,926
Transportation.....	86	106,154,096	97,966,029	71,291	--	89,493	63,516
Water transportation.....	36	5,214,507	3,254,417	*11,131	--	*61,319	*16,979
All other transportation.....	48	100,898,780	94,630,485	59,272	--	28,174	46,121
Communication.....	32	246,682,526	143,533,627	*36,873	--	*592,581	*357,348
Electric, gas, and sanitary services.....	39	319,982,046	124,539,421	1,231,196	--	498,074	725,062

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

**Table 1b.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by SIC Classification)
--Continued**

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

Major and selected minor industrial group	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 resulting from foreign taxes deemed paid (gross-up)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Wholesale and retail trade.....	782	424,052,069	679,808,010	1,710,436	--	820,799	832,089
Wholesale trade.....	513	201,266,182	273,664,027	961,978	--	508,393	405,101
Groceries and related products.....	10	2,258,588	3,804,623	*6,653	--	*265	*1,301
Machinery, equipment, and supplies.....	57	8,128,163	7,904,869	*13,758	--	*5,346	*7,778
Miscellaneous wholesale trade.....	445	190,879,431	261,954,535	941,567	--	502,782	396,022
Drugs, chemicals, and allied products.....	19	24,914,265	33,814,377	*75,904	--	*42,548	*69,486
Petroleum and petroleum products.....	8	*17,311,893	*10,339,775	*90,077	--	*49,648	*55,975
Other miscellaneous wholesale trade.....	288	147,570,289	216,628,689	774,418	--	390,205	257,029
Retail trade.....	270	222,785,887	406,143,984	748,459	--	312,406	426,988
Building materials, garden supplies, and mobile home dealers.....	14	*20,148,216	*42,521,495	*43,676	--	--	*31,906
General merchandise stores.....	8	*99,635,030	*240,025,855	*8,003	--	*65,769	*10,960
Food stores.....	10	5,316,006	10,394,638	*4	--	--	--
Automotive dealers and service stations.....	18	*451,576	*1,390,642	*167	--	*7	--
Apparel and accessory stores.....	13	27,948,693	42,908,181	*530,607	--	*135,566	*191,858
Furniture and home furnishing stores.....	11	3,366,439	2,506,762	*2,445	--	*9,985	*1,634
Eating and drinking places.....	29	44,737,280	27,402,608	*159,269	--	*63,469	*186,309
All other retail stores.....	166	21,170,067	38,962,191	*4,287	--	*37,610	*4,322
Finance, insurance, and real estate.....	1,724	9,526,885,253	1,485,647,335	3,155,182	*(²)	4,123,434	2,439,859
Banking.....	300	3,311,684,955	306,383,259	845,381	--	921,235	606,456
Credit agencies other than banks.....	26	1,463,301,969	119,186,187	*420,809	--	*407,083	*138,427
Security, commodity brokers, and services.....	83	1,304,938,129	147,961,669	281,885	*(²)	649,041	692,054
Insurance.....	234	3,197,539,541	846,688,164	796,912	--	1,750,215	453,884
Insurance agents, brokers, and service.....	56	54,024,165	13,285,310	72,972	--	*41,095	*71,436
Real estate.....	362	132,306,625	32,894,694	94,728	--	*3,110	*2,720
Holding and other investment companies, except bank holding companies.....	659	62,685,204	18,491,181	641,884	--	350,889	474,167
Services.....	1,133	361,259,647	254,606,500	1,096,456	--	659,205	970,732
Hotels and other lodging places.....	13	29,691,649	31,863,249	*25,045	--	*13,424	*20,467
Personal services.....	11	6,442,025	6,593,329	*32,281	--	*822	*20,204
Business services.....	260	154,944,036	122,040,305	758,000	--	544,188	767,061
Auto repair; miscellaneous repair services.....	14	7,092,225	5,641,239	*2,253	--	*5,918	*3,996
Amusement and recreation services.....	140	76,792,014	35,641,540	*176,280	--	*29,935	*96,612
All other services.....	686	85,952,282	51,727,814	100,781	--	62,121	61,739

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1b.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by SIC Classification)

--Continued

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

Major and selected minor industrial group	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	General business credit	U.S. income tax after credits ³
			Total	Regular and alternative minimum tax				
	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
All industries.....	398,898,244	377,129,783	132,740,630	132,832,709	37,338,380	339,990	3,855,629	88,652,512
Agriculture, forestry, and fishing.....	524,523	500,095	175,522	175,520	52,931	--	*5,461	114,937
Mining.....	4,147,891	3,866,280	1,398,196	1,397,159	504,285	--	*56,252	810,693
Metal mining.....	606,201	555,978	212,134	212,134	90,904	--	--	118,074
Coal mining.....	*365,294	*343,811	*128,393	*128,393	*62,483	--	*1	*65,895
Oil and gas extraction.....	2,769,431	2,563,513	914,555	913,523	335,656	--	*55,666	504,440
Nonmetallic minerals, except fuels.....	402,111	398,163	142,078	142,073	15,229	--	*585	121,262
Construction.....	973,898	922,097	323,166	319,907	70,498	--	*10,507	235,333
General building contractors.....	517,288	473,621	165,402	164,162	50,517	--	*10,278	98,240
Heavy construction contractors.....	375,170	372,490	131,582	129,775	11,828	--	*227	119,422
Special trade contractors.....	79,363	73,924	25,560	25,348	7,791	--	*2	17,575
Manufacturing.....	198,568,318	185,943,283	65,542,089	65,641,464	27,171,848	333,719	2,345,425	34,658,931
Food and kindred products.....	13,107,334	12,160,424	4,297,812	4,297,805	1,939,616	*45,211	66,104	2,195,003
Tobacco manufactures.....	*7,624,782	*7,356,266	*2,575,377	*2,575,377	*1,228,545	--	*17,332	*1,320,415
Textile mill products.....	469,662	431,727	150,471	150,471	9,369	--	*3,068	133,917
Apparel and other textile products.....	2,051,342	2,032,983	720,175	719,993	165,124	*229	*4,112	550,713
Lumber and wood products.....	778,764	746,643	261,081	261,081	8,886	--	*618	226,523
Furniture and fixtures.....	1,143,789	1,122,214	393,423	393,435	57,306	--	*5,825	330,089
Paper and allied products.....	4,039,028	3,895,780	1,379,059	1,379,314	549,375	*114	50,819	762,691
Printing and publishing.....	6,683,275	6,133,778	2,158,242	2,157,936	158,780	*348	5,414	1,991,424
Industrial plastics and synthetic material.....	10,757,189	9,428,678	3,355,717	3,355,818	1,521,323	*1,878	81,014	1,604,750
Drugs.....	20,286,959	18,665,518	6,539,410	6,539,410	2,644,473	*237,337	462,366	3,147,847
Other chemicals.....	9,493,491	9,248,899	3,265,697	3,265,697	1,356,731	*1,840	80,336	1,826,506
Petroleum (including integrated) and coal products.....	21,182,883	20,693,021	7,253,421	7,260,725	4,295,129	--	*151,794	2,402,413
Rubber and miscellaneous plastics products.....	2,297,462	2,199,926	771,096	771,592	321,530	*784	11,733	388,096
Leather and leather products.....	*209,676	*206,687	*72,063	*72,063	*12,309	--	*506	*59,249
Stone, clay, and glass products.....	2,699,818	2,501,265	876,245	876,102	143,440	--	10,215	704,686
Primary metal industries.....	3,443,473	3,216,331	1,126,287	1,137,950	395,210	--	20,075	665,004
Fabricated metal products.....	6,031,625	5,769,483	2,017,253	2,018,145	599,144	--	29,691	1,372,805
Office, computing, and accounting equipment.....	11,024,116	10,863,315	3,913,571	3,913,516	3,062,138	--	67,841	770,156
Other machinery, except electrical.....	12,768,712	11,645,087	4,085,825	4,086,438	1,850,891	*43	57,211	2,152,970
Electrical and electronic equipment.....	28,257,254	25,950,300	9,069,071	9,159,453	2,666,334	--	550,938	5,832,481
Motor vehicles and equipment.....	14,565,432	13,938,180	5,049,549	5,037,701	2,582,991	--	420,301	2,014,728
Transportation equipment, except motor vehicles.....	6,218,031	5,524,409	1,933,136	1,932,987	328,002	--	65,429	1,522,958
Instruments and related products.....	11,068,207	10,005,152	3,506,188	3,505,153	1,086,682	*45,934	160,774	2,124,567
Miscellaneous manufacturing and manufacturing not allocable.....	2,090,700	1,982,993	692,739	694,057	173,186	--	17,717	500,634
Transportation and public utilities.....	40,064,661	39,178,320	13,735,369	13,740,278	1,198,523	--	281,424	11,556,307
Transportation.....	7,002,879	6,378,475	2,275,545	2,275,545	148,191	--	36,416	1,646,362
Water transportation.....	486,260	427,277	153,573	153,573	55,058	--	*1,460	85,724
All other transportation.....	6,507,851	5,942,432	2,118,991	2,118,991	91,593	--	34,955	1,559,198
Communication.....	20,001,054	19,836,675	6,915,389	6,920,929	411,647	--	115,513	6,365,598
Electric, gas, and sanitary services.....	13,037,964	12,948,838	4,539,558	4,538,930	637,459	--	129,495	3,540,750

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1b.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by SIC Classification)
--Continued

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

Major and selected minor industrial group	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	General business credit	U.S. income tax after credits ³
			Total	Regular and alternative minimum tax				
	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
Wholesale and retail trade.....	30,454,071	29,888,664	10,476,109	10,477,054	1,276,965	--	173,663	8,739,864
Wholesale trade.....	9,378,747	8,899,756	3,121,614	3,121,472	537,639	--	52,166	2,318,751
Groceries and related products.....	128,248	126,639	43,989	43,989	3,350	--	--	37,809
Machinery, equipment, and supplies.....	435,635	388,663	134,711	134,715	15,030	--	*1,872	114,746
Miscellaneous wholesale trade.....	8,814,865	8,384,454	2,942,914	2,942,769	519,259	--	50,294	2,166,196
Drugs, chemicals, and allied products..	713,251	594,644	211,677	211,663	89,888	--	*2,486	94,469
Petroleum and petroleum products.....	*350,182	*306,584	*107,173	*107,173	*32,522	--	*5,701	*55,850
Other miscellaneous wholesale trade...	7,589,152	7,330,665	2,572,163	2,572,031	387,244	--	42,107	1,973,971
Retail trade.....	21,075,324	20,988,909	7,354,495	7,355,582	739,326	--	121,497	6,421,113
Building materials, garden supplies, and mobile home dealers.....	*2,949,054	*2,947,119	*1,031,378	*1,031,378	*29,783	--	*7,281	*994,314
General merchandise stores.....	*9,785,892	*9,741,478	*3,409,765	*3,409,765	*66,168	--	*57,640	*3,220,983
Food stores.....	332,702	331,070	114,357	115,743	10,938	--	*1,645	101,774
Automotive dealers and service stations..	*42,549	*42,064	*14,425	*14,425	*557	--	38	*13,765
Apparel and accessory stores.....	3,720,526	3,718,355	1,312,151	1,312,151	234,535	--	*6,187	1,069,646
Furniture and home furnishing stores.....	163,028	161,363	55,811	56,180	2,567	--	*193	52,749
Eating and drinking places.....	2,529,229	2,510,700	879,932	879,265	367,663	--	38,247	471,921
All other retail stores.....	1,551,969	1,536,446	536,569	536,569	27,113	--	10,256	495,866
Finance, insurance, and real estate.....	101,941,949	95,892,380	33,737,730	33,732,319	5,581,569	--	701,540	26,985,727
Banking.....	26,260,749	25,723,785	9,036,799	9,036,705	2,076,142	--	344,496	6,510,705
Credit agencies other than banks.....	5,927,835	5,693,391	1,992,568	1,992,568	524,201	--	*63,772	1,403,324
Security, commodity brokers, and services..	9,861,688	9,313,231	3,270,743	3,269,452	1,054,742	--	26,940	2,097,491
Insurance.....	52,889,296	48,181,415	16,997,445	16,996,572	1,356,070	--	246,363	15,135,975
Insurance agents, brokers, and service.....	1,933,942	2,201,602	764,277	764,277	70,467	--	*7,598	681,608
Real estate.....	1,332,972	1,207,311	425,434	423,644	17,341	--	*3,814	402,384
Holding and other investment companies, except bank holding companies.....	3,701,134	3,537,337	1,238,659	1,237,296	480,937	--	8,520	744,137
Services.....	22,185,305	20,902,122	7,339,653	7,336,212	1,470,371	*6,271	281,357	5,549,313
Hotels and other lodging places.....	1,401,357	1,364,685	479,013	478,673	40,307	*6,271	*38,617	393,784
Personal services.....	1,346,588	1,344,174	470,311	470,311	21,441	--	*1,842	447,029
Business services.....	12,483,461	11,664,641	4,104,880	4,102,185	1,107,272	--	194,774	2,775,665
Auto repair; miscellaneous repair services...	276,896	171,004	61,643	61,562	4,783	--	*1,142	55,684
Amusement and recreation services.....	2,822,438	2,640,500	921,990	921,990	171,511	--	*13,409	736,860
All other services.....	3,808,918	3,672,387	1,286,419	1,286,093	123,331	--	30,952	1,127,474

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1b.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by SIC Classification)
--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118						
	Gross income (less loss)						
	Total	Dividends	Foreign dividend income resulting from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Service income	Other income
	(16)	(17)	(18)	(19)	(20)	(21)	(22)
All industries.....	349,386,789	60,541,096	27,074,099	68,413,782	55,875,295	23,414,004	114,068,512
Agriculture, forestry, and fishing.....	285,435	56,952	*42,782	*26,048	*19,842	*945	*138,866
Mining.....	5,537,629	347,907	112,335	217,728	397,328	2,154,382	2,307,949
Metal mining.....	1,149,376	*9,635	*3,097	*32,979	*267	*265,367	*838,030
Coal mining.....	*488,956	5,237	*997	*65,083	*28,475	*-14,039	*403,203
Oil and gas extraction.....	3,830,365	305,631	91,239	111,975	363,688	1,902,891	1,054,941
Nonmetallic minerals, except fuels.....	68,839	*27,310	*17,001	*7,691	*4,898	*163	*11,776
Construction.....	699,779	95,216	32,627	10,327	62,688	372,694	126,227
General building contractors.....	392,846	83,235	*25,960	*5,707	*48,976	217,458	*11,510
Heavy construction contractors.....	208,339	*3,908	*2,121	*2,274	*7,816	*126,403	*65,818
Special trade contractors.....	96,477	8,073	*4,546	*2,345	*3,780	28,832	*48,899
Manufacturing.....	175,788,740	45,611,630	21,488,230	9,484,570	38,330,878	3,553,378	57,320,053
Food and kindred products.....	11,051,056	3,760,822	1,649,593	345,371	2,134,463	158,641	3,002,166
Tobacco manufactures.....	*6,412,358	*2,370,305	*1,103,909	*57,025	*1,166,241	--	*1,714,878
Textile mill products.....	76,735	28,157	7,789	*4,194	*18,636	*851	*17,109
Apparel and other textile products.....	989,431	307,488	164,315	29,807	348,188	*12,782	*126,851
Lumber and wood products.....	142,965	*55,215	*2,626	*33,450	*10,499	*113	*41,063
Furniture and fixtures.....	246,481	130,628	*56,395	*9,203	11,273	*7,631	*31,351
Paper and allied products.....	2,395,056	785,638	481,273	44,233	512,362	*50,881	520,669
Printing and publishing.....	5,209,003	340,223	110,460	20,858	2,541,890	136,745	2,058,826
Industrial plastics and synthetic material.....	10,037,665	3,207,742	1,322,956	420,956	1,811,764	185,339	3,088,909
Drugs.....	14,461,763	4,329,884	2,502,427	251,517	2,794,200	*195,728	4,388,007
Other chemicals.....	7,678,029	2,258,089	1,215,606	146,190	1,845,157	44,385	2,168,601
Petroleum (including integrated) and coal products.....	27,901,527	6,137,025	2,920,129	3,801,909	498,907	*96,823	14,446,735
Rubber and miscellaneous plastics products.....	1,700,258	473,946	327,859	63,006	383,945	*35,444	416,058
Leather and leather products.....	*146,620	*8,293	*3,713	*1,710	*61,302	*13,693	*57,908
Stone, clay, and glass products.....	942,347	329,201	150,926	32,165	135,049	*61,879	233,128
Primary metal industries.....	2,451,399	765,368	318,862	146,422	137,310	28,615	1,054,822
Fabricated metal products.....	3,205,723	1,011,003	499,003	139,315	255,955	110,425	1,190,022
Office, computing, and accounting equipment.....	16,454,054	2,396,863	1,369,173	256,597	10,297,921	*328,278	1,805,221
Other machinery, except electrical.....	10,318,942	4,068,873	1,466,367	442,670	693,220	221,865	3,425,947
Electrical and electronic equipment.....	24,956,701	5,136,356	2,356,017	2,074,137	3,796,075	1,171,215	10,422,900
Motor vehicles and equipment.....	11,268,229	4,648,874	2,305,548	403,197	1,707,216	*3,865	2,199,530
Transportation equipment, except motor vehicles.....	4,408,784	598,047	237,186	418,810	733,669	624,461	1,796,611
Instruments and related products.....	11,731,509	2,105,014	766,622	303,085	5,878,926	51,133	2,626,729
Miscellaneous manufacturing and manufacturing not allocable.....	1,446,673	340,801	145,874	20,348	496,308	*11,879	431,463
Transportation and public utilities.....	20,865,576	2,818,518	1,145,429	810,465	391,954	9,092,416	6,606,793
Transportation.....	9,084,396	159,553	63,516	53,008	72,391	8,698,324	37,604
Water transportation.....	306,120	*72,012	*16,979	*6,741	*110	*182,869	*27,410
All other transportation.....	8,768,119	86,653	46,121	46,194	72,281	8,506,682	*10,187
Communication.....	7,883,226	928,771	*357,293	149,305	268,236	259,594	5,920,028
Electric, gas, and sanitary services.....	3,888,203	1,730,195	724,620	608,152	*51,327	129,308	644,602

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1b.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by SIC Classification)
--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118						
	Gross income (less loss)						
	Total	Dividends	Foreign dividend income resulting from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Service income	Other income
	(16)	(17)	(18)	(19)	(20)	(21)	(22)
Wholesale and retail trade.....	10,000,750	2,522,847	832,143	583,221	1,501,570	309,391	4,251,578
Wholesale trade.....	5,152,708	1,464,378	405,146	319,207	363,315	104,981	2,495,681
Groceries and related products.....	59,532	*6,914	*1,301	*2,325	*5,899	*1,634	*41,459
Machinery, equipment, and supplies.....	234,636	19,105	*7,778	11,988	*12,998	*3,752	179,015
Miscellaneous wholesale trade.....	4,858,540	1,438,359	396,067	304,894	344,418	99,594	2,275,207
Drugs, chemicals, and allied products.....	687,121	*116,435	*69,530	*15,275	*33,512	*14,049	438,320
Petroleum and petroleum products.....	*339,621	*139,722	*55,978	*4,110	*309	*3,444	*136,059
Other miscellaneous wholesale trade.....	3,774,287	1,160,642	257,029	285,044	310,526	81,662	1,679,384
Retail trade.....	4,848,042	1,058,469	426,997	264,015	1,138,254	204,410	1,755,897
Building materials, garden supplies, and mobile home dealers.....	*89,418	*43,698	*31,906	--	*13,156	--	*658
General merchandise stores.....	*715,165	*73,812	*10,960	*21,179	*137,559	*191,669	*279,987
Food stores.....	84,804	*10	--	*12,166	*71,218	--	*1,410
Automotive dealers and service stations.....	*12,293	*175	--	*247	*11,679	--	*192
Apparel and accessory stores.....	1,105,845	*666,141	*191,863	*7,584	*83,259	--	156,997
Furniture and home furnishing stores.....	34,803	*12,430	*1,637	*187	*12,896	--	*7,653
Eating and drinking places.....	2,308,071	*220,665	*186,309	*200,080	667,270	*7,539	*1,026,207
All other retail stores.....	497,625	41,538	*4,322	*22,570	141,216	*5,203	282,776
Finance, insurance, and real estate.....	109,353,735	7,149,158	2,438,877	56,781,286	2,543,806	2,644,466	37,796,142
Banking.....	53,753,319	1,804,201	605,892	34,704,362	1,379,414	520,891	14,738,560
Credit agencies other than banks.....	16,357,242	774,571	*138,427	7,482,252	*252,139	*2,340	7,707,511
Security, commodity brokers, and services.....	12,576,796	838,724	692,054	6,933,236	*17,310	379,365	3,716,107
Insurance.....	23,684,583	2,532,278	453,456	7,161,860	812,240	1,467,088	11,257,661
Insurance agents, brokers, and service.....	403,097	112,771	*71,434	*14,789	*15	*140,696	*63,393
Real estate.....	603,580	97,885	*2,720	396,280	*21,560	*74,026	11,109
Holding and other investment companies, except bank holding companies.....	1,958,326	987,352	474,180	88,492	61,127	60,060	287,115
Services.....	26,807,506	1,901,950	972,476	500,136	12,626,868	5,286,331	5,519,746
Hotels and other lodging places.....	655,156	*38,469	*20,467	59,209	*88,170	*106,473	*342,368
Personal services.....	99,882	*33,103	*20,204	*4,714	*20,137	*16,472	*5,253
Business services.....	19,605,488	1,306,195	767,370	272,646	9,336,728	3,089,796	4,832,753
Auto repair; miscellaneous repair services.....	50,422	*8,019	*3,996	*1,357	*23,753	*5,865	*7,431
Amusement and recreation services.....	3,946,056	346,883	*96,611	*151,228	2,925,024	*326,979	*99,330
All other services.....	2,411,948	164,667	63,174	10,788	227,942	1,740,163	205,214

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1b.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by SIC Classification)
--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued							
	Gross income (less loss)--Continued			Deductions				
	Oil and gas extraction income (less loss) [‡]	Foreign branch income [‡]	Specifically allocable income [section 863(b)] [‡]	Total	Deductions allocable to specific types of income			
					Total	Rental, royalty, and licensing expenses		Service expenses
				Depreciation, depletion, and amortization		Other		
	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)
All industries.....	15,127,351	87,251,267	9,176,112	202,269,920	108,022,787	1,290,753	6,110,720	13,036,724
Agriculture, forestry, and fishing.....	--	--	*127,202	*115,564	*70,985	--	*307	--
Mining.....	472,333	2,007,499	--	3,462,161	2,619,659	102,587	33,994	665,804
Metal mining.....	--	*220,753	--	*876,391	*692,728	*830	*95	*18,190
Coal mining.....	--	*61,285	--	*284,929	*244,603	--	--	--
Oil and gas extraction.....	*461,279	1,701,647	--	2,283,875	1,675,451	101,757	33,885	647,507
Nonmetallic minerals, except fuels.....	*11,054	*23,814	--	*16,965	*6,876	--	*14	*107
Construction.....	--	*107,451	*23,307	458,270	383,923	*2,089	*1,686	273,016
General building contractors.....	--	*60,014	*23,307	235,121	204,282	*10	*455	*151,980
Heavy construction contractors.....	--	*27,581	--	155,226	*117,511	*1,148	*992	*99,516
Special trade contractors.....	--	*19,856	--	*67,004	*61,211	*25	*228	*21,520
Manufacturing.....	14,509,761	21,589,235	8,538,198	80,943,008	45,083,686	231,239	1,954,701	1,307,834
Food and kindred products.....	--	1,686,674	*71,879	4,297,904	2,450,022	*1,504	*741,022	*18,645
Tobacco manufactures.....	--	*954,818	--	*2,390,864	*1,650,364	--	*36,764	--
Textile mill products.....	--	*1,639	*4,676	32,541	*7,205	--	--	*725
Apparel and other textile products.....	--	*122,504	*1,788	296,541	151,153	*53	*14,539	*4,209
Lumber and wood products.....	--	*952	--	*56,401	*14,522	--	--	--
Furniture and fixtures.....	--	*23,406	*960	*69,353	*30,863	*1,034	--	*2,055
Paper and allied products.....	--	15,641	*43,218	781,672	255,588	*5	*10,465	*6,198
Printing and publishing.....	--	269,734	*3,671	3,760,614	2,143,176	*432	121,619	*70,228
Industrial plastics and synthetic material.....	*1,335,459	1,115,467	*119,928	5,083,615	2,550,648	*4,526	*12,411	*111,889
Drugs.....	--	1,287,087	*444,041	5,458,801	2,697,371	--	*105,265	*44,199
Other chemicals.....	--	1,357,243	*225,167	3,297,801	1,685,067	*1,148	*1,168	*14,167
Petroleum (including integrated) and coal products.....	13,174,302	9,090,042	*472,640	15,055,260	12,984,024	*11,673	*267,321	*108,026
Rubber and miscellaneous plastics products.....	--	142,337	*16,195	690,218	416,670	*3,688	*12,909	*1,190
Leather and leather products.....	--	*9,840	--	*71,593	*28,320	*39	*15,578	--
Stone, clay, and glass products.....	--	*63,539	*80,075	417,517	182,477	*31	*887	*51,728
Primary metal industries.....	--	391,176	*58,910	1,237,755	753,662	*121,368	*7,213	*3,110
Fabricated metal products.....	--	315,735	*12,483	1,333,091	706,451	*3,955	*16,746	*88,328
Office, computing, and accounting equipment.....	--	1,154,855	*41,602	6,613,897	1,892,105	*4	*15,866	*8,292
Other machinery, except electrical.....	--	574,462	252,776	4,381,134	2,100,492	*1,723	69,174	91,892
Electrical and electronic equipment.....	--	1,042,464	5,281,063	13,096,633	6,764,787	*6,820	168,017	116,875
Motor vehicles and equipment.....	--	*1,110,706	*327,587	3,657,824	1,070,808	*15,482	*1,304	*1,902
Transportation equipment, except motor vehicles.....	--	427,944	*78,952	2,642,022	2,131,142	*41,371	*179,544	*528,824
Instruments and related products.....	--	284,282	1,000,587	5,401,336	1,987,459	*1,907	49,393	29,421
Miscellaneous manufacturing and manufacturing not allocable.....	--	144,802	--	772,380	419,208	*14,270	*98,970	*5,335
Transportation and public utilities.....	*13,226	6,119,843	*1,132	14,020,153	12,389,580	7,347	14,316	5,747,958
Transportation.....	--	4,724,738	*1,132	8,039,025	7,800,446	*1,503	*4,649	5,513,662
Water transportation.....	--	*26,636	--	*108,142	*84,426	*333	*1,758	*80,422
All other transportation.....	--	*4,698,101	*1,132	7,925,273	7,710,411	*1,169	*2,891	5,427,630
Communication.....	--	*607,694	--	4,514,299	3,949,526	*60	*8,064	*220,141
Electric, gas, and sanitary services.....	*13,226	787,411	--	1,461,136	638,078	*5,784	*1,603	*12,626

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1b.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by SIC Classification)
--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued								
	Gross income (less loss)--Continued			Total	Deductions				
	Oil and gas extraction income (less loss) ⁴	Foreign branch income ⁴	Specifically allocable income [section 863(b)] ⁴		Total	Deductions allocable to specific types of income			Service expenses
						Depreciation, depletion, and amortization	Rental, royalty, and licensing expenses	Other	
(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)		
Wholesale and retail trade.....	*111,489	2,329,487	*86,253	4,737,737	3,008,232	4,915	361,400	158,257	
Wholesale trade.....	*111,489	794,889	*86,253	2,607,891	1,445,111	3,490	255,873	67,322	
Groceries and related products.....	--	*13,972	--	*47,190	*41,978	*1,290	*27,939	*1,592	
Machinery, equipment, and supplies.....	--	*24,412	*11,485	139,194	*66,489	*855	*2,894	*3,476	
Miscellaneous wholesale trade.....	*111,489	756,506	*72,454	2,421,507	1,336,644	*1,344	225,040	62,254	
Drugs, chemicals, and allied products..	--	*330,704	*48,075	355,849	*40,169	--	--	*13,254	
Petroleum and petroleum products.....	*111,489	*3,608	--	*228,842	*126,647	--	*14	*767	
Other miscellaneous wholesale trade...	--	422,194	*24,379	1,809,221	1,149,624	*1,344	206,101	47,898	
Retail trade.....	--	1,534,597	*2,314	2,129,846	1,563,122	*1,426	105,527	*90,935	
Building materials, garden supplies, and mobile home dealers.....	--	--	--	*3,909	--	--	--	--	
General merchandise stores.....	--	*284,521	--	*437,436	*333,843	*369	--	*88,917	
Food stores.....	--	--	--	*4,282	*3,489	--	*2,595	--	
Automotive dealers and service stations..	--	--	--	*6,200	*6,200	--	*4,679	--	
Apparel and accessory stores.....	--	*13,702	--	166,639	*113,155	--	*6,497	--	
Furniture and home furnishing stores.....	--	--	--	*12,773	*6,704	--	*3,147	--	
Eating and drinking places.....	--	*959,583	*125	1,236,659	885,508	--	*8,436	*1,148	
All other retail stores.....	--	*276,792	*2,189	261,948	*214,222	*1,057	*80,172	*871	
Finance, insurance, and real estate.....	*20,542	49,311,082	*2,140	80,205,399	32,351,951	691,380	1,019,041	1,119,170	
Banking.....	--	34,193,438	--	44,588,772	14,925,464	*427,782	333,456	*164,693	
Credit agencies other than banks.....	--	*5,465,375	--	12,363,752	7,590,320	*64,763	*2,844	*19,972	
Security, commodity brokers, and services..	--	*343,090	--	8,513,284	1,846,172	*151,091	*438,545	*207,083	
Insurance.....	--	9,165,065	--	14,065,403	7,504,116	*45,290	227,945	585,945	
Insurance agents, brokers, and service.....	--	*54,976	--	200,094	*167,619	*209	*70	*112,161	
Real estate.....	--	*34,814	--	65,722	53,240	*2,003	*9,191	*23,006	
Holding and other investment companies, except bank holding companies.....	*20,542	54,323	*144	398,213	255,389	*241	3,772	*3,109	
Services.....	--	5,785,513	397,880	18,326,211	12,114,300	251,195	2,725,275	3,764,685	
Hotels and other lodging places.....	--	*339,753	--	*489,482	*396,530	*4,593	*6,767	*8,206	
Personal services.....	--	*01,670	*3,167	*26,379	*17,005	--	*22	*12,702	
Business services.....	--	4,878,678	245,969	12,716,652	7,357,647	19,785	579,010	2,334,597	
Auto repair; miscellaneous repair services...	--	*935	--	22,115	*13,389	*144	*468	*3,440	
Amusement and recreation services.....	--	*175,354	*142,579	3,329,168	2,836,096	*225,955	2,047,944	*235,307	
All other services.....	--	365,427	*6,164	1,710,331	1,463,994	*718	91,064	1,145,009	

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1b.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by SIC Classification)

--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued							
	Deductions--Continued						Taxable income (less loss) before adjustments	Adjustments to taxable income
	Other deductions allocable to specific types of income	Deductions not allocable to specific types of income				Deductions from oil and gas extraction income ⁵		
		Total	Research and development	Interest	Other			
(31)	(32)	(33)	(34)	(35)	(36)	(37)	(38)	
All industries.....	87,584,590	94,247,133	9,876,318	49,478,293	32,808,117	9,369,404	147,116,869	10,480,879
Agriculture, forestry, and fishing.....	*70,678	*44,579	*24,454	*10,035	*10,090	--	169,870	*4,916
Mining.....	1,817,274	842,502	*52,884	304,042	453,900	*260,679	2,075,468	173,668
Metal mining.....	*673,614	*183,663	--	*94,285	*89,378	--	272,985	*10,858
Coal mining.....	*244,603	*40,326	--	*37,862	--	--	*204,027	*1,575
Oil and gas extraction.....	892,302	608,424	*51,360	164,792	363,205	*260,679	1,546,490	161,234
Nonmetallic minerals, except fuels.....	*6,755	*10,089	*1,524	*7,102	*1,316	--	51,873	--
Construction.....	107,131	74,348	*415	10,803	49,421	--	241,509	22,723
General building contractors.....	*51,837	*30,839	--	*3,812	*27,003	--	157,725	*350
Heavy construction contractors.....	*15,855	*37,715	*144	*3,348	*21,304	--	53,112	*17,192
Special trade contractors.....	*39,438	*5,794	*271	*3,644	*1,113	--	29,472	*5,181
Manufacturing.....	41,589,912	35,859,322	7,256,462	13,046,001	15,171,429	8,987,198	94,845,732	5,245,162
Food and kindred products.....	1,688,851	1,847,883	55,026	753,973	964,300	--	6,753,152	577,935
Tobacco manufactures.....	*1,613,599	*740,500	*53,142	*2,748,37	*412,521	--	*4,021,495	*34,829
Textile mill products.....	*6,480	25,336	*1,469	*17,822	*4,702	--	44,194	*709
Apparel and other textile products.....	*132,352	145,388	*2,696	*119,580	*17,779	--	692,890	*133,852
Lumber and wood products.....	*14,522	*41,878	*180	*26,768	*14,931	--	86,565	*7,604
Furniture and fixtures.....	*27,773	*38,490	*938	*29,466	*8,086	--	177,128	*3,355
Paper and allied products.....	238,920	526,084	*107,444	118,502	291,249	--	1,613,384	*5,123
Printing and publishing.....	1,950,897	1,617,438	*6,081	178,922	1,414,574	--	1,448,389	792,238
Industrial plastics and synthetic material.....	2,421,822	2,532,967	513,615	1,436,180	577,425	*414,343	4,954,051	212,169
Drugs.....	2,547,908	2,761,430	632,284	651,349	1,428,501	--	9,002,962	*4,078
Other chemicals.....	1,668,584	1,612,734	424,770	511,194	663,512	--	4,380,227	272,378
Petroleum (including integrated) and coal products.....	12,597,004	2,071,236	*128,195	1,486,882	*452,595	8,572,855	12,846,267	77,748
Rubber and miscellaneous plastics products.....	398,884	273,549	85,528	97,672	78,359	--	1,010,039	26,352
Leather and leather products.....	*12,703	*43,273	--	*5,273	*37,080	--	*75,027	*6,490
Stone, clay, and glass products.....	129,830	235,040	*46,995	94,829	*83,794	--	524,829	*2,062
Primary metal industries.....	621,970	484,094	24,051	256,142	200,413	--	1,213,644	22,216
Fabricated metal products.....	597,421	626,640	84,078	268,742	269,977	--	1,872,632	53,416
Office, computing, and accounting equipment.....	1,867,944	4,721,791	1,442,827	733,924	2,543,691	--	9,840,157	*734,883
Other machinery, except electrical.....	1,937,703	2,280,642	325,597	638,178	1,247,297	--	5,937,808	101,644
Electrical and electronic equipment.....	6,473,075	6,331,846	1,419,483	2,645,023	2,229,490	--	11,860,067	1,454,220
Motor vehicles and equipment.....	1,052,121	2,587,016	538,778	1,848,172	178,756	--	7,610,405	5,476
Transportation equipment, except motor vehicles.....	1,381,403	510,880	153,226	217,719	*138,302	--	1,766,762	*161,513
Instruments and related products.....	1,906,737	3,413,877	1,100,378	536,149	1,761,443	--	6,330,173	467,982
Miscellaneous manufacturing and manufacturing not allocable.....	300,634	353,172	102,447	90,557	144,920	--	674,293	76,679
Transportation and public utilities.....	6,619,959	1,630,573	79,669	1,288,718	253,533	*10,551	6,845,423	198,704
Transportation.....	2,280,633	238,578	*17,961	88,628	129,208	--	1,045,371	14,909
Water transportation.....	*1,913	*23,716	--	*15,540	*6,749	--	197,978	*13,293
All other transportation.....	2,278,720	214,863	*17,961	73,088	122,459	--	842,846	*1,616
Communication.....	3,721,261	564,773	*61,310	*435,009	*67,205	--	3,368,927	*845
Electric, gas, and sanitary services.....	618,065	823,058	*398	765,080	57,120	*10,551	2,427,068	182,950

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1b.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by SIC Classification)
--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued							
	Deductions--Continued						Taxable income (less loss) before adjustments	Adjustments to taxable income
	Other deductions allocable to specific types of income	Deductions not allocable to specific types of income				Deductions from oil and gas extraction income ⁵		
		Total	Research and development	Interest	Other			
	(31)	(32)	(33)	(34)	(35)	(36)	(37)	(38)
Wholesale and retail trade.....	2,483,660	1,729,505	23,956	784,762	878,464	*110,976	5,263,013	407,703
Wholesale trade.....	1,118,426	1,162,780	23,248	457,756	647,175	*110,976	2,544,817	164,119
Groceries and related products.....	*11,157	*5,212	--	*224	--	--	12,343	--
Machinery, equipment, and supplies.....	*59,264	*72,705	*282	*17,414	*54,450	--	95,442	*28,028
Miscellaneous wholesale trade.....	1,048,005	1,084,864	22,967	440,118	592,725	*110,976	2,437,033	136,091
Drugs, chemicals, and allied products...	*26,915	315,680	*5,563	*81,953	*216,719	--	331,272	*50,187
Petroleum and petroleum products.....	*125,866	*102,195	--	*2,140	*100,055	*110,976	*110,780	*616
Other miscellaneous wholesale trade....	894,280	659,598	17,367	348,671	275,951	--	1,965,066	85,288
Retail trade.....	1,365,234	566,724	*707	327,006	231,289	--	2,718,196	243,584
Building materials, garden supplies, and mobile home dealers.....	--	*3,909	--	--	--	--	*85,509	--
General merchandise stores.....	*244,557	*103,593	*10	*53,386	*49,899	--	*277,730	*25,047
Food stores.....	*894	*793	--	*572	*202	--	80,521	*34,959
Automotive dealers and service stations...	*1,521	--	--	--	--	--	*6,093	*2,092
Apparel and accessory stores.....	*106,658	53,484	*416	*45,118	*7,495	--	939,205	*146,159
Furniture and home furnishing stores.....	*3,557	*6,068	--	*768	*3,556	--	22,031	--
Eating and drinking places.....	*875,924	*351,151	--	*196,718	*153,136	--	1,071,412	*1,208
All other retail stores.....	*132,123	47,725	*281	*30,445	*16,999	--	235,678	*34,118
Finance, insurance, and real estate.....	29,522,361	47,853,448	194,212	33,466,865	12,729,162	--	29,148,336	1,766,094
Banking.....	13,999,534	29,663,308	*184,617	21,833,466	6,843,179	--	9,164,547	5,166
Credit agencies other than banks.....	7,502,741	4,773,433	--	*4,080,349	*415,166	--	3,993,490	*775,978
Security, commodity brokers, and services...	1,049,453	6,667,112	*4,819	6,197,948	463,851	--	4,063,512	*287,786
Insurance.....	6,644,935	6,561,288	*897	1,290,971	4,962,359	--	9,619,180	656,505
Insurance agents, brokers, and service.....	*55,179	*32,475	*3,399	*26,487	*2,586	--	203,004	*131
Real estate.....	19,040	12,482	--	*8,950	*3,154	--	537,858	38,698
Holding and other investment companies, except bank holding companies.....	248,267	142,823	*480	28,182	38,851	--	1,560,114	1,832
Services.....	5,373,145	6,211,911	2,244,225	566,944	3,261,503	--	8,481,295	2,650,258
Hotels and other lodging places.....	*376,963	*92,953	--	*57,278	*22,481	--	165,674	*15,317
Personal services.....	*4,282	*9,373	*269	*4,499	*2,298	--	73,504	*3,456
Business services.....	4,424,255	5,359,005	2,154,394	180,519	2,926,944	--	6,888,836	2,403,392
Auto repair; miscellaneous repair services....	*9,338	*8,726	(²)	*3,093	*3,304	--	28,306	*9,738
Amusement and recreation services.....	*326,889	493,072	*17,947	*273,839	*184,357	--	616,888	*22,640
All other services.....	227,203	246,337	*70,888	47,691	120,615	--	701,616	195,715

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1b.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by SIC Classification)

--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued						
	Taxable income (less loss) after adjustments	Foreign taxes available for credit				Paid or accrued	
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Total	Taxes withheld at source on dividends
	(39)	(40)	(41)	(42)	(43)	(44)	(45)
All industries.....	136,635,990	47,575,987	2,476,970	9,368,659	40,684,298	13,608,822	2,193,964
Agriculture, forestry, and fishing.....	164,954	60,983	--	*1,676	59,306	16,525	1,539
Mining.....	1,901,801	1,015,562	*320,756	573,326	762,992	650,658	10,812
Metal mining.....	262,127	365,335	--	*139,153	226,182	*223,085	*4,892
Coal mining.....	*202,452	*124,047	*12,254	*40,994	*95,307	*94,310	*(²)
Oil and gas extraction.....	1,385,255	507,024	*301,304	389,221	419,107	327,868	4,868
Nonmetallic minerals, except fuels.....	51,873	19,141	*7,199	*3,958	22,382	5,380	*1,038
Construction.....	218,785	94,874	--	15,488	79,387	46,759	630
General building contractors.....	157,375	68,319	--	*11,793	56,526	30,566	452
Heavy construction contractors.....	35,920	13,997	--	*1,579	12,418	10,297	*49
Special trade contractors.....	24,291	12,196	--	*2,116	10,080	5,534	*128
Manufacturing.....	89,600,571	34,120,725	2,151,006	7,490,718	28,781,013	7,291,579	1,675,680
Food and kindred products.....	6,175,217	2,239,102	--	137,919	2,101,183	451,356	130,478
Tobacco manufactures.....	*3,986,666	*1,257,071	--	*11,306	*1,245,765	*141,856	*62,661
Textile mill products.....	43,485	11,149	--	*1,945	9,204	1,415	*107
Apparel and other textile products.....	559,038	203,074	--	*2,755	200,319	36,005	*11,995
Lumber and wood products.....	78,961	14,122	--	*4,524	9,599	6,973	*2,143
Furniture and fixtures.....	173,772	73,690	--	*12,406	61,283	4,889	*3,593
Paper and allied products.....	1,608,262	600,713	--	*30,407	570,306	89,033	33,542
Printing and publishing.....	656,151	307,869	--	26,475	281,394	170,934	10,535
Industrial plastics and synthetic material.....	4,741,882	1,861,076	*10,967	199,176	1,672,867	349,774	115,804
Drugs.....	8,998,884	3,157,143	*17	275,478	2,881,682	379,255	169,925
Other chemicals.....	4,107,850	1,806,913	--	165,115	1,641,798	426,191	43,371
Petroleum (including integrated) and coal products.....	12,768,519	6,777,573	2,136,259	3,987,506	4,926,325	2,006,042	220,158
Rubber and miscellaneous plastics products.....	983,688	407,286	--	23,052	384,234	56,374	21,950
Leather and leather products.....	*68,537	*12,411	--	*4	*12,406	*8,693	*429
Stone, clay, and glass products.....	522,767	216,266	--	37,735	178,531	27,605	*9,933
Primary metal industries.....	1,191,427	607,420	*2,608	209,334	400,694	81,832	21,592
Fabricated metal products.....	1,819,217	715,263	--	121,574	593,688	94,686	46,138
Office, computing, and accounting equipment.....	9,105,274	3,623,014	--	*1,630,286	1,992,728	623,555	139,165
Other machinery, except electrical.....	5,836,164	2,009,071	*1,155	68,902	1,941,324	474,956	210,857
Electrical and electronic equipment.....	10,405,847	3,648,553	--	348,113	3,300,440	944,423	114,925
Motor vehicles and equipment.....	7,604,929	2,844,479	--	128,785	2,715,695	410,147	232,471
Transportation equipment, except motor vehicles.....	1,605,249	349,964	--	12,751	337,213	100,027	19,448
Instruments and related products.....	5,862,191	1,140,482	--	25,723	1,114,759	347,459	36,106
Miscellaneous manufacturing and manufacturing not allocable.....	597,614	219,221	--	24,010	195,211	49,338	18,124
Transportation and public utilities.....	6,646,719	1,700,827	*2,214	156,649	1,546,392	400,964	92,338
Transportation.....	1,030,462	186,734	--	13,150	173,584	110,068	3,790
Water transportation.....	184,685	83,333	--	*521	82,812	65,833	*975
All other transportation.....	841,229	99,948	--	11,253	88,695	42,574	2,726
Communication.....	3,368,082	552,280	--	*81,429	470,851	113,558	29,159
Electric, gas, and sanitary services.....	2,244,118	960,397	*2,214	61,946	900,665	176,045	59,389

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

**Table 1b.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by SIC Classification)
--Continued**

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued						
	Taxable income (less loss) after adjustments	Foreign taxes available for credit				Paid or accrued	
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Total	Taxes withheld at source on dividends
Wholesale and retail trade.....	4,855,311	1,793,928	*137	444,425	1,349,641	517,498	103,021
Wholesale trade.....	2,380,698	848,969	*137	177,248	671,858	266,712	83,597
Groceries and related products.....	12,343	4,529	--	*1,468	3,061	*1,760	*457
Machinery, equipment, and supplies.....	67,414	16,088	--	*1,320	14,769	6,990	*506
Miscellaneous wholesale trade.....	2,300,942	828,351	*137	174,461	654,028	257,962	82,634
Drugs, chemicals, and allied products.....	281,085	223,211	--	*70,857	152,354	82,824	*4,747
Petroleum and petroleum products.....	*110,163	*108,589	*137	*46,380	*62,346	*6,369	*4,219
Other miscellaneous wholesale trade.....	1,879,778	482,491	--	57,183	425,308	168,280	73,640
Retail trade.....	2,474,612	944,959	--	267,176	677,783	250,786	19,424
Building materials, garden supplies, and mobile home dealers.....	*85,509	*34,638	--	--	*34,638	*2,732	*-58
General merchandise stores.....	*252,682	*99,134	--	*56,079	*43,055	*32,096	*6,686
Food stores.....	45,562	11,190	--	*2,758	*8,432	*8,432	*2
Automotive dealers and service stations.....	*4,001	*557	--	*60	*497	*497	*26
Apparel and accessory stores.....	793,046	298,756	--	*80,511	218,245	26,382	*2,188
Furniture and home furnishing stores.....	22,031	2,751	--	*21	2,731	*1,094	*106
Eating and drinking places.....	1,070,204	460,677	--	*122,907	337,770	151,461	*10,146
All other retail stores.....	201,559	37,256	--	*4,841	32,415	28,093	*328
Finance, insurance, and real estate.....	27,382,242	6,390,808	*2,326	477,240	5,915,894	3,476,843	225,074
Banking.....	9,159,381	2,462,854	--	124,364	2,338,489	1,732,424	71,717
Credit agencies other than banks.....	3,217,512	602,877	--	*61,464	541,413	402,985	*29,159
Security, commodity brokers, and services.....	3,775,726	1,122,624	--	9,756	1,112,868	420,814	17,100
Insurance.....	8,962,675	1,435,898	--	142,235	1,293,663	840,208	70,579
Insurance agents, brokers, and service.....	202,873	78,283	--	*633	77,650	6,216	3,274
Real estate.....	499,160	21,259	--	3,126	18,132	15,412	9,780
Holding and other investment companies, except bank holding companies.....	1,558,282	665,005	*2,326	135,648	531,683	57,503	23,355
Services.....	5,831,037	2,386,891	*530	207,871	2,179,550	1,207,074	84,855
Hotels and other lodging places.....	150,357	76,339	--	*22,398	53,941	33,474	*1,791
Personal services.....	70,048	37,173	--	*11,789	25,384	5,181	*1,844
Business services.....	4,485,444	1,799,417	*508	84,956	1,714,969	947,599	64,651
Auto repair; miscellaneous repair services.....	18,568	7,499	--	*8	7,491	3,495	*1,085
Amusement and recreation services.....	594,248	264,491	--	*12,227	252,264	155,654	*11,139
All other services.....	505,901	199,589	--	75,633	123,956	60,782	4,050

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1b.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by SIC Classification)
--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued						Taxes deemed paid
	Foreign taxes available for credit--Continued						
	Paid or accrued--Continued						
	Taxes withheld at source on--		Other taxes paid or accrued on--				
Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income		
(46)	(47)	(48)	(49)	(50)	(51)	(52)	
All industries.....	784,126	2,213,430	4,861,563	8,524	387,240	3,159,976	27,075,476
Agriculture, forestry, and fishing.....	*1,052	*3,209	*8,276	--	*142	2,307	*42,782
Mining.....	10,615	13,048	260,017	--	30,009	326,157	112,335
Metal mining.....	*2,525	*(2)	*108,420	--	*15,902	*91,346	*35,490
Coal mining.....	*4,138	--	*11,224	--	--	*78,949	*997
Oil and gas extraction.....	3,720	12,887	140,374	--	14,106	151,914	91,239
Nonmetallic minerals, except fuels.....	*233	*161	--	--	--	*3,948	*17,001
Construction.....	*471	11,595	*3,023	--	18,142	12,899	32,627
General building contractors.....	*99	*10,455	*2,316	--	*14,808	*2,436	*25,960
Heavy construction contractors.....	*114	*595	*38	--	*2,025	*7,476	*2,121
Special trade contractors.....	*258	*183	*668	--	*1,309	*2,987	*4,546
Manufacturing.....	156,889	1,553,770	1,954,303	3,851	126,598	1,820,487	21,489,435
Food and kindred products.....	11,671	91,974	172,035	*48	*6,498	38,654	1,649,827
Tobacco manufactures.....	*84	*63,488	*11,460	--	--	*4,163	*1,103,909
Textile mill products.....	*412	*334	*306	*74	*64	*118	7,789
Apparel and other textile products.....	*108	18,876	*4,599	--	*132	*296	164,315
Lumber and wood products.....	*742	*382	*3,096	--	*11	*598	*2,626
Furniture and fixtures.....	*525	455	*169	--	*146	--	*56,395
Paper and allied products.....	2,567	27,085	25,313	--	*222	303	481,273
Printing and publishing.....	675	126,325	*12,501	--	*5,979	14,918	110,460
Industrial plastics and synthetic material.....	8,053	94,360	97,841	*41	7,898	25,775	1,323,094
Drugs.....	9,737	74,776	88,591	*558	*4,566	31,103	2,502,427
Other chemicals.....	8,292	67,929	111,138	*422	*3,966	191,074	1,215,606
Petroleum (including integrated) and coal products.....	34,773	*8,138	*932,296	--	*481	810,196	2,920,283
Rubber and miscellaneous plastics products.....	1,829	20,520	11,074	--	*708	*293	327,859
Leather and leather products.....	*68	*7,834	*339	--	*23	--	*3,713
Stone, clay, and glass products.....	722	5,519	*805	*10	*5,541	*27,515	150,926
Primary metal industries.....	3,944	6,688	*20,740	--	*548	28,320	318,862
Fabricated metal products.....	3,570	10,246	8,816	--	*1,060	24,856	499,003
Office, computing, and accounting equipment.....	*1,389	408,526	50,853	--	*2,521	21,100	1,369,173
Other machinery, except electrical.....	12,069	28,932	184,799	*44	24,764	13,491	1,466,367
Electrical and electronic equipment.....	34,912	151,824	98,417	*1,567	12,514	530,264	2,356,017
Motor vehicles and equipment.....	10,647	77,446	*45,816	*883	*29,738	*13,145	2,305,548
Transportation equipment, except motor vehicles.....	2,064	25,308	33,551	*13	*16,681	*2,962	237,186
Instruments and related products.....	6,446	218,655	24,353	*191	*2,064	59,645	767,300
Miscellaneous manufacturing and manufacturing not allocable.....	790	11,082	15,143	--	*81	4,117	145,874
Transportation and public utilities.....	23,216	13,248	66,149	*590	76,390	129,031	1,145,429
Transportation.....	3,694	*3,168	27,677	*590	69,830	*1,319	63,516
Water transportation.....	*102	--	*44	--	*64,555	*157	*16,979
All other transportation.....	3,592	*3,168	*27,633	*590	*3,704	*1,162	46,121
Communication.....	*5,256	8,978	*35,505	--	*2,619	32,041	*357,293
Electric, gas, and sanitary services.....	14,266	*1,102	*2,967	--	*2,650	95,671	724,620

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 1b.--U.S. Corporation Returns with a Foreign Tax Credit: Total Assets, Income, Tax, and Credits, and Foreign Income and Tax Reported on Form 1118, by Selected Industrial Group (by SIC Classification)
--Continued

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

Major and selected minor industrial group	Foreign income and taxes reported on Form 1118--Continued						Taxes deemed paid
	Foreign taxes available for credit--Continued						
	Paid or accrued--Continued						
	Taxes withheld at source on--		Other taxes paid or accrued on--				
	Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income	
(46)	(47)	(48)	(49)	(50)	(51)	(52)	
Wholesale and retail trade.....	17,767	121,790	231,685	*594	7,024	35,617	832,143
Wholesale trade.....	10,920	35,390	116,660	*594	6,763	12,787	1,185,669
Groceries and related products.....	*134	*584	*506	--	*79	--	*1,301
Machinery, equipment, and supplies.....	*1,271	*658	*3,555	--	*30	*972	*7,778
Miscellaneous wholesale trade.....	9,516	34,149	112,600	*594	6,654	11,815	396,067
Drugs, chemicals, and allied products.....	*120	*520	*76,027	--	*1,152	*257	*69,530
Petroleum and petroleum products.....	*235	*229	*993	--	*315	*378	*55,978
Other miscellaneous wholesale trade.....	9,114	33,392	35,531	*594	5,187	10,821	257,028
Retail trade.....	6,847	86,400	115,025	--	*261	22,830	426,997
Building materials, garden supplies, and mobile home dealers.....	*1	*2,699	--	--	--	90	*31,906
General merchandise stores.....	*163	*7,873	*15,103	--	*59	*2,212	*10,960
Food stores.....	*1,150	*7,280	--	--	--	--	--
Automotive dealers and service stations.....	*26	*15	--	--	--	430	--
Apparel and accessory stores.....	*113	*3,414	*2,319	--	--	*18,348	*191,863
Furniture and home furnishing stores.....	*18	*709	--	--	--	*261	*1,637
Eating and drinking places.....	*5,108	51,838	*82,737	--	*143	*1,489	*186,309
All other retail stores.....	*268	12,572	*14,866	--	*59	--	*4,322
Finance, insurance, and real estate.....	569,415	23,626	1,914,397	*64	51,246	693,022	2,439,051
Banking.....	213,055	3,822	1,265,892	--	7,445	170,492	24,264
Credit agencies other than banks.....	*28,203	*12,654	*285,335	--	*4,502	*43,133	*138,427
Security, commodity brokers, and services.....	126,629	*419	*37,624	--	*6,730	232,313	692,054
Insurance.....	194,743	2,562	319,879	*64	29,775	222,605	453,456
Insurance agents, brokers, and service.....	*147	*3	*1,987	--	*529	*276	*71,434
Real estate.....	2,163	*380	*78	--	*1,440	1,571	*2,720
Holding and other investment companies, except bank holding companies.....	4,472	*3,784	*3,603	--	*825	21,464	474,180
Services.....	4,701	473,131	422,818	*3,424	77,689	140,456	972,476
Hotels and other lodging places.....	*378	*7,834	*13,706	--	*7,420	*2,344	*20,467
Personal services.....	*229	*1,736	*905	--	*424	*44	*38,019
Business services.....	3,085	332,307	403,684	*3,424	29,997	110,450	767,370
Auto repair; miscellaneous repair services.....	*112	*1,984	*35	--	*37	*241	*3,996
Amusement and recreation services.....	*779	116,664	*543	--	*11,659	*14,869	*96,611
All other services.....	*97	12,411	3,564	--	28,152	12,507	63,174

Footnotes on next page.

Corporate Foreign Tax Credit, 1998

Footnotes and Notes to Table 1b:

* Data should be used with caution because of the small number of 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 26-35. 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 52 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 36 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 36, respectively) are contained in the summary columns (i.e., columns 16 through 22 and 26 through 35), 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. Code section 863(b) income (income partly within and partly without the United States) and foreign branch income are also included in the summary amounts reported in columns 16 through 22 and are also reported separately (on Schedule F) in columns 24 and 25. Total deductions not allocable to specific types of income (column 32) are equal to the sum of columns 33 through 35 (any differences are due to taxpayer reporting practices). Total foreign-source gross income (column 16) less total foreign deductions (column 26) is equal to foreign-source taxable income before adjustments (column 37).

Adjustments to foreign-source taxable income (reported in column 38) 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 after adjustments (the numerator of the limitation fraction) is reported in column 39. 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 40 through 52. 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 43 through 52. Total foreign taxes paid or accrued (column 44) are the sum of columns 45 through 51 (any differences are due to taxpayer reporting practices). Total foreign taxes paid, accrued, and deemed paid (column 43) are equal to the sum of total taxes paid or accrued (column 44) and taxes deemed paid (column 52). 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 41, as well as carryovers of foreign taxes not credited in prior years, which are reported in column 42. Thus, total foreign taxes available for credit (column 40) are equal to total foreign taxes paid, accrued, and deemed paid (column 43) less certain foreign taxes (column 41), plus any carryover of prior-year foreign taxes (column 42).

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type

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

Industrial division and income type	Number of returns	Foreign income and taxes reported on Form 1118						
		Gross income (less loss)						
		Total	Dividends	Foreign dividend income resulting from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Service income	Other income
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
ALL INDUSTRIES								
All income types.....	5,927	349,386,789	60,541,096	27,074,099	68,413,782	55,875,295	23,414,004	114,068,512
Passive income.....	2,289	7,444,176	3,301,216	420,416	2,238,285	357,158	*2,114	1,124,987
High withholding tax interest.....	368	2,493,508	81,028	47,678	2,364,803	--	--	--
Financial services income.....	438	109,792,724	6,612,198	2,155,388	56,210,747	3,139,828	2,528,774	39,145,789
Shipping income.....	47	7,795,938	220,695	41,205	73,147	474,708	*6,710,261	275,922
Dividends from noncontrolled section 902 corp.....	510	3,143,059	2,145,866	938,720	49,627	*4,540	*243	4,063
Dividends from an IC-DISC or former DISC ¹	7	*10,993	*10,993	--	--	--	--	--
Miscellaneous separately calculated limitation.....	9	*38,907	*4,806	*1,121	--	--	--	*32,980
Certain distributions from a FSC or former FSC ²	75	3,370,102	3,370,012	*90	--	--	--	--
General limitation income.....	3,791	215,247,350	44,774,167	23,462,053	7,458,970	51,899,061	14,172,611	73,480,487
Section 901(i) income.....	6	*783	*1,734	--	--	--	--	*-951
Income re-sourced by treaty.....	7	*49,249	*18,383	*7,426	*18,204	--	--	*5,236
AGRICULTURE, FORESTRY, FISHING, AND HUNTING								
All income types.....	81	290,450	62,274	*43,927	*26,361	*18,293	*1	*139,594
Passive income.....	76	11,938	*232	*59	*10,302	*1,388	--	*-42
High withholding tax interest.....	--	--	--	--	--	--	--	--
Financial services income.....	--	--	--	--	--	--	--	--
Shipping income.....	--	--	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	3	*1,548	*1,217	*330	--	--	--	--
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	**	**	**	--	--	--	--	--
General limitation income.....	8	*258,058	*41,919	*43,538	*16,060	*16,905	*1	*139,636
Section 901(i) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--
MINING								
All income types.....	101	5,357,393	363,579	*117,974	228,918	409,764	2,043,709	2,193,449
Passive income.....	25	68,539	27,949	*2,123	35,912	*10	--	*2,545
High withholding tax interest.....	8	*42,885	*3,541	*2,087	*37,257	--	--	--
Financial services income.....	--	--	--	--	--	--	--	--
Shipping income.....	**	**	--	--	--	--	--	**
Dividends from noncontrolled section 902 corp.....	6	*54,095	*37,575	*16,277	--	--	--	*244
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--	--
General limitation income.....	92	5,192,220	294,129	97,488	155,749	409,754	2,043,709	2,191,392
Section 901(i) income.....	**	**	**	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--
UTILITIES								
All income types.....	32	3,499,547	1,496,487	636,148	567,383	*40,447	127,571	631,511
Passive income.....	22	433,740	141,180	2,563	38,067	--	*64	*251,867
High withholding tax interest.....	5	*12,882	--	--	*12,882	--	--	--
Financial services income.....	4	*40,943	*1,893	*200	*169	*33,079	*5,562	*39
Shipping income.....	**	**	--	--	--	**	--	**
Dividends from noncontrolled section 902 corp.....	8	*115,130	*66,071	*19,957	*29,020	--	--	*83
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--	--
General limitation income.....	24	2,885,573	1,287,344	613,429	487,245	--	*121,946	375,610
Section 901(i) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type--Continued

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

Industrial division and income type	Number of returns	Foreign income and taxes reported on Form 1118						
		Gross income (less loss)						
		Total	Dividends	Foreign dividend income resulting from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Service income	Other income
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
CONSTRUCTION								
All income types.....	221	558,544	47,556	*31,498	5,390	19,911	331,390	122,799
Passive income.....	59	9,407	890	--	*1,195	*420	*21	*6,881
High withholding tax interest.....	4	*1,654	--	--	*1,654	--	--	--
Financial services income.....	--	--	--	--	--	--	--	--
Shipping income.....	--	--	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	50	*3,739	*2,694	*883	--	--	--	*162
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--	--
General limitation income.....	116	543,744	43,971	*30,615	*2,541	*19,491	331,369	115,756
Section 901(j) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--
MANUFACTURING								
All income types.....	1,510	167,963,972	44,303,840	21,134,234	9,412,797	35,137,332	3,360,666	54,615,104
Passive income.....	562	5,211,826	2,628,746	307,539	1,782,488	207,203	*1,014	284,836
High withholding tax interest.....	117	379,289	*553	*3,120	375,617	--	--	--
Financial services income.....	64	5,973,455	1,027,178	339,107	1,415,064	*678,577	*8,063	2,505,467
Shipping income.....	20	535,381	113,650	*6,325	*40,302	*293,090	*1,707	80,308
Dividends from noncontrolled section 902 corp.....	209	1,465,239	927,084	503,586	18,480	*4,417	--	11,673
Dividends from an IC-DISC or former DISC ¹	7	*10,993	*10,993	--	--	--	--	--
Miscellaneous separately calculated limitation.....	8	*9,674	*4,806	*1,121	--	--	--	*3,747
Certain distributions from a FSC or former FSC ²	50	2,955,419	2,955,329	*90	--	--	--	--
General limitation income.....	1,222	151,378,234	36,615,772	19,965,919	5,762,644	33,954,044	3,349,882	51,729,972
Section 901(i) income.....	5	*397	*1,348	--	--	--	--	*-951
Income re-sourced by treaty.....	6	*44,064	*18,383	*7,426	*18,204	--	--	*52
WHOLESALE AND RETAIL TRADE								
All income types.....	809	9,007,432	2,595,939	747,611	416,232	1,058,946	500,106	3,688,599
Passive income.....	395	319,232	124,668	10,966	68,780	43,368	--	71,451
High withholding tax interest.....	57	45,468	*1,156	*3,443	40,869	--	--	--
Financial services income.....	8	*175,039	*46,332	*7,623	*77,926	--	--	*43,158
Shipping income.....	**	**	**	**	--	--	--	*(?)
Dividends from noncontrolled section 902 corp.....	55	35,530	*25,159	10,058	--	--	*243	*70
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	**	**	**	--	--	--	--	--
General limitation income.....	413	8,415,709	2,382,554	715,138	228,656	1,015,578	499,862	3,573,921
Section 901(j) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--
TRANSPORTATION AND WAREHOUSING								
All income types.....	87	9,086,753	162,535	64,475	54,343	72,419	8,695,634	37,348
Passive income.....	41	14,697	10,539	*688	*3,375	*94	--	*1
High withholding tax interest.....	10	17,729	--	--	17,729	--	--	--
Financial services income.....	5	*23,437	*10,197	--	--	--	*13,199	*41
Shipping income.....	13	6,925,381	*82,669	*34,358	*25,762	*47,964	*6,708,554	*26,074
Dividends from noncontrolled section 902 corp.....	7	*9,484	*7,842	*1,642	--	--	--	--
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--	--
General limitation income.....	45	2,096,025	51,288	27,786	7,478	24,360	1,973,881	11,232
Section 901(i) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type--Continued

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

Industrial division and income type	Number of returns	Foreign income and taxes reported on Form 1118						
		Gross income (less loss)						
		Total	Dividends	Foreign dividend income resulting from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Service income	Other income
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
INFORMATION								
All income types	161	31,202,763	3,115,765	1,274,993	453,340	13,941,701	1,597,173	10,819,790
Passive income.....	55	857,772	134,650	44,954	151,408	55,732	*1	471,027
High withholding tax interest.....	6	*8,057	--	--	*8,057	--	--	--
Financial services income.....	4	*19,713	*15	--	*2	*8,496	--	*11,200
Shipping income.....	4	*207,137	*3,357	--	*3,166	*126,286	--	*74,327
Dividends from noncontrolled section 902 corp.....	14	571,603	449,411	122,003	*125	--	--	*64
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	**	**	--	--	--	--	--	**
Certain distributions from a FSC or former FSC ² ...	6	*240,501	*240,501	--	--	--	--	--
General limitation income.....	139	29,268,748	2,287,831	1,108,036	290,581	13,751,187	1,597,172	10,233,940
Section 901(j) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--
FINANCE, INSURANCE, AND REAL ESTATE								
All income types	1,490	55,137,632	4,464,750	1,370,649	22,304,212	1,170,297	2,818,974	23,008,749
Passive income.....	498	183,344	95,664	5,800	50,267	13,527	--	18,085
High withholding tax interest.....	108	791,568	*47,385	*9,485	734,698	--	--	--
Financial services income.....	251	51,624,197	4,013,013	1,260,885	21,435,301	1,046,539	2,024,638	21,843,822
Shipping income.....	**	**	**	**	**	--	--	* ⁽⁹⁾
Dividends from noncontrolled section 902 corp.....	49	199,275	145,734	51,534	*7	*122	--	*1,878
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ² ...	**	**	**	--	--	--	--	--
General limitation income.....	726	2,295,092	122,584	42,925	80,174	110,108	794,336	1,144,964
Section 901(j) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--
SERVICES								
All income types	1,435	67,282,303	3,928,370	1,652,590	34,944,806	4,006,186	3,938,780	18,811,570
Passive income.....	556	333,680	136,699	45,725	96,491	35,415	*1,015	18,335
High withholding tax interest.....	53	1,193,976	*28,393	*29,543	1,136,040	--	--	--
Financial services income.....	102	51,935,940	1,513,570	547,574	33,282,285	1,373,137	*477,313	14,742,061
Shipping income.....	3	*92,403	*99	*117	*153	--	--	*92,035
Dividends from noncontrolled section 902 corp.....	108	687,415	483,080	212,450	*1,995	--	--	*-10,110
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ² ...	16	*119,756	*119,756	--	--	--	--	--
General limitation income.....	1,006	12,913,948	1,646,774	817,181	427,843	2,597,634	3,460,453	3,964,064
Section 901(j) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	**	**	--	--	--	--	--	**

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type--Continued

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

Industrial division and income type	Foreign income and taxes reported on Form 1118--Continued							
	Gross income (less loss)--Continued				Deductions			
	Oil and gas extraction income (less loss) ⁴	Foreign branch income ⁴	Specifically allocable income [section 863(b)] ⁴	Total	Deductions allocable to specific types of income			Service expenses
					Total	Depreciation, depletion, and amortization	Rental, royalty, and licensing expenses Other	
(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	
ALL INDUSTRIES								
All income types	15,127,351	87,251,267	9,176,112	202,269,920	108,022,787	1,290,753	6,110,720	13,036,724
Passive income.....	*6,466	450,004	*2,430	1,876,663	511,814	8,431	49,050	*2,293
High withholding tax interest.....	--	263,153	*136	1,028,408	140,149	--	*1,614	*1,590
Financial services income.....	--	49,337,353	--	81,744,094	33,505,524	687,531	980,954	937,327
Shipping income.....	--	*4,111,550	--	6,960,589	6,658,183	*108,512	*115,130	*3,816,804
Dividends from noncontrolled section 902 corp.....	--	*3,187	*(³)	741,611	86,434	*(³)	*102	*1,832
Dividends from an IC-DISC or former DISC ¹	--	--	--	*9,387	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	*11,517	*4,547	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	3,308,114	3,288,078	--	--	--
General limitation income.....	15,120,884	33,086,020	9,173,546	106,575,151	63,818,371	486,279	4,963,871	8,276,878
Section 901(i) income.....	--	--	--	*2,371	*268	--	--	--
Income re-sourced by treaty.....	--	--	--	*12,015	*32	--	--	--
AGRICULTURE, FORESTRY, FISHING, AND HUNTING								
All income types	--	--	*127,202	*119,484	*71,634	--	*686	*(³)
Passive income.....	--	--	--	*6,355	--	--	--	--
High withholding tax interest.....	--	--	--	--	--	--	--	--
Financial services income.....	--	--	--	--	--	--	--	--
Shipping income.....	--	--	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	--	--	--	*743	--	--	--	--
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	**	**	--	--	--
General limitation income.....	--	--	*127,202	*93,481	*52,728	--	*686	*(³)
Section 901(i) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--
MINING								
All income types	*369,280	1,975,904	--	3,290,604	2,451,032	102,247	25,709	649,775
Passive income.....	--	*21,663	--	8,909	*1,614	--	*4	--
High withholding tax interest.....	--	--	--	*4,912	*8	--	--	--
Financial services income.....	--	--	--	--	--	--	--	--
Shipping income.....	--	--	--	**	--	--	--	--
Dividends from noncontrolled section 902 corp.....	--	--	--	*10,318	*622	--	--	--
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--	--
General limitation income.....	*369,280	1,954,240	--	3,266,464	2,448,789	102,247	25,705	649,775
Section 901(i) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--
UTILITIES								
All income types	*13,226	784,550	--	1,306,909	615,244	*5,784	*1,603	*11,606
Passive income.....	--	*273,136	--	79,157	35,181	*(³)	*648	--
High withholding tax interest.....	--	*13	--	*4,339	*(³)	--	--	--
Financial services income.....	--	*5,562	--	*32,438	*26,864	--	--	*2,007
Shipping income.....	--	--	--	**	**	**	**	--
Dividends from noncontrolled section 902 corp.....	--	--	--	*38,526	*5,100	*(³)	*26	--
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--	--
General limitation income.....	*13,226	*505,840	--	1,143,853	542,673	*374	*913	*9,599
Section 901(i) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type--Continued

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

Industrial division and income type	Foreign income and taxes reported on Form 1118--Continued							
	Gross income (less loss)--Continued				Deductions			
	Oil and gas extraction income (less loss) ⁴	Foreign branch income ⁴	Specifically allocable income [section 863(b)] ⁴	Total	Deductions allocable to specific types of income			Service expenses
					Total	Depreciation, depletion, and amortization	Rental, royalty, and licensing expenses Other	
(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	
CONSTRUCTION								
All income types	--	*107,451	--	381,474	336,455	*1,183	*1,675	256,540
Passive income.....	--	--	--	*783	*742	*10	*24	--
High withholding tax interest.....	--	--	--	*20	--	--	--	--
Financial services income.....	--	--	--	--	--	--	--	--
Shipping income.....	--	--	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	--	--	--	*845	*58	--	--	--
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ² ...	--	--	--	--	--	--	--	--
General limitation income.....	--	*107,451	--	379,826	335,655	*1,173	*1,651	256,540
Section 901(i) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--
MANUFACTURING								
All income types	14,612,814	21,097,281	8,215,612	76,260,938	42,276,285	224,324	1,741,975	1,240,576
Passive income.....	*6,466	148,224	*2,260	1,440,295	394,645	*4,667	*11,136	*521
High withholding tax interest.....	--	*1,071	*136	100,993	27,463	--	--	--
Financial services income.....	--	*456,077	--	3,899,782	2,170,180	*5,755	--	*1,902
Shipping income.....	--	*40,401	--	466,502	386,215	*38,979	*113,040	*2,631
Dividends from noncontrolled section 902 corp.....	--	*2,126	--	433,536	45,837	--	*76	*1,832
Dividends from an IC-DISC or former DISC ¹	--	--	--	*9,387	*9,387	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	*10,191	*4,547	--	--	--
Certain distributions from a FSC or former FSC ² ...	--	--	--	2,935,211	2,935,036	--	--	--
General limitation income.....	14,606,348	20,449,382	8,213,215	66,950,656	36,302,674	174,922	1,617,724	1,233,690
Section 901(i) income.....	--	--	--	*2,371	*268	--	--	--
Income re-sourced by treaty.....	--	--	--	*12,015	*32	--	--	--
WHOLESALE AND RETAIL TRADE								
All income types	*111,489	1,682,666	*65,874	4,151,614	2,682,751	4,979	348,695	286,624
Passive income.....	--	*1,781	--	167,023	18,413	*595	*8,944	*39
High withholding tax interest.....	--	--	--	13,135	*5,470	--	--	--
Financial services income.....	--	*11,407	--	*73,426	*45,416	*240	*4	--
Shipping income.....	--	--	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	--	--	--	14,881	*1,680	--	--	--
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ² ...	--	--	--	--	--	--	--	--
General limitation income.....	*111,489	1,669,478	*65,874	3,868,115	2,597,284	4,144	339,747	286,586
Section 901(i) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--
TRANSPORTATION AND WAREHOUSING								
All income types	--	4,724,738	*3,128	8,035,750	7,795,999	*1,503	*4,649	5,510,783
Passive income.....	--	*7	*1	4,099	*254	--	* ⁽³⁾	--
High withholding tax interest.....	--	--	--	*487	*54	--	--	--
Financial services income.....	--	--	--	*15,038	*12,591	--	--	*9,259
Shipping income.....	--	*4,071,149	--	6,248,963	*6,057,481	*64	*36	*3,814,172
Dividends from noncontrolled section 902 corp.....	--	--	--	*3,634	--	--	--	--
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ² ...	--	--	--	--	--	--	--	--
General limitation income.....	--	653,581	*3,127	1,763,529	1,725,618	*1,438	*4,613	1,687,352
Section 901(i) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type--Continued

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

Industrial division and income type	Foreign income and taxes reported on Form 1118--Continued							
	Gross income (less loss)--Continued				Deductions			
	Oil and gas extraction income (less loss) ⁴	Foreign branch income ⁴	Specifically allocable income [section 863(b)] ⁴	Total	Deductions allocable to specific types of income			Service expenses
					Total	Depreciation, depletion, and amortization	Rental, royalty, and licensing expenses Other	
(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	
INFORMATION								
All income types	--	3,054,897	*243,296	19,911,938	12,634,227	232,406	2,283,489	1,282,885
Passive income.....	--	*879	--	83,371	18,628	--	*6,962	--
High withholding tax interest.....	--	--	--	*3,559	*42	--	--	--
Financial services income.....	--	--	--	*19,571	*18,478	--	--	--
Shipping income.....	--	--	--	*142,009	*119,319	*64,059	*1,806	--
Dividends from noncontrolled section 902 corp.....	--	--	--	72,186	*22,577	--	--	--
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	**	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	*211,806	*211,560	--	--	--
General limitation income.....	--	3,054,018	*243,296	19,378,111	12,243,622	168,347	2,274,721	1,282,885
Section 901(j) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--
FINANCE, INSURANCE, AND REAL ESTATE								
All income types	--	15,943,921	*144	36,408,313	17,775,632	266,215	700,719	1,368,707
Passive income.....	--	*381	--	36,180	26,846	*2,263	11,896	*59
High withholding tax interest.....	--	*2	--	285,815	95,048	--	*1,550	*1,590
Financial services income.....	--	15,143,996	--	34,185,448	16,465,403	*253,962	652,943	776,236
Shipping income.....	--	--	--	**	--	--	--	--
Dividends from noncontrolled section 902 corp.....	--	--	--	46,351	*9,549	--	--	--
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	**	**	--	--	--
General limitation income.....	--	799,543	*144	1,833,236	1,157,573	9,990	34,330	590,822
Section 901(i) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--
SERVICES								
All income types	*20,542	37,879,859	520,856	52,402,896	21,383,528	452,113	1,001,519	2,429,227
Passive income.....	--	*3,933	*168	50,490	15,490	*895	9,436	*1,675
High withholding tax interest.....	--	*262,067	--	615,149	12,064	--	*63	--
Financial services income.....	--	33,720,312	--	43,518,392	14,766,592	*427,574	*328,006	*147,924
Shipping income.....	--	--	--	*93,722	*89,562	--	*232	--
Dividends from noncontrolled section 902 corp.....	--	*1,061	--	120,592	1,012	--	*(³)	--
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	*106,671	*87,055	--	--	--
General limitation income.....	*20,542	3,892,487	520,688	7,897,880	6,411,754	23,644	663,781	2,279,629
Section 901(i) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type--Continued

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

Industrial division and income type	Foreign income and taxes reported on Form 1118--Continued								
	Deductions--Continued							Taxable income (less loss) before adjustments	Adjustments to taxable income
	Other deductions allocable to specific types of income	Deductions not allocable to specific types of income				Deductions from oil and gas extraction income ⁵			
		Total	Research and development	Interest	Other				
(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)		
ALL INDUSTRIES									
All income types	87,584,590	94,247,133	9,876,318	49,478,293	32,808,117	9,369,404	147,116,869	10,480,879	
Passive income.....	452,040	1,364,849	100,470	917,624	312,363	*4	5,567,513	169,103	
High withholding tax interest.....	136,946	888,259	2,273	746,677	135,097	--	1,465,100	59,714	
Financial services income.....	30,899,712	48,238,570	198,176	34,333,832	12,617,472	--	28,048,630	1,701,605	
Shipping income.....	2,617,737	302,406	*9,556	141,728	149,704	--	835,349	88,096	
Dividends from noncontrolled section 902 corp.....	84,500	655,177	26,147	515,748	85,234	--	2,401,448	-237,971	
Dividends from an IC-DISC or former DISC ¹	*9,387	--	--	--	--	--	*1,606	*-7	
Miscellaneous separately calculated limitation.....	*4,547	*6,969	*456	*3,303	*3,211	--	*27,390	*-7,096	
Certain distributions from a FSC or former FSC ²	3,288,078	*20,036	--	*12,294	*7,742	--	61,988	3,002	
General limitation income.....	50,091,343	42,756,780	9,539,078	12,793,537	19,496,919	9,369,400	108,672,198	8,707,371	
Section 901(j) income.....	*268	*2,102	*162	*1,863	*78	--	*-1,588	*-2,927	
Income re-sourced by treaty.....	*32	*11,984	--	*11,686	*297	--	*37,233	*-11	
AGRICULTURE, FORESTRY, FISHING, AND HUNTING									
All income types	*70,947	*47,851	*24,454	*10,035	*10,090	--	170,965	*4,916	
Passive income.....	--	*6,355	*214	*5,385	*756	--	5,584	*321	
High withholding tax interest.....	--	--	--	--	--	--	--	--	
Financial services income.....	--	--	--	--	--	--	--	--	
Shipping income.....	--	--	--	--	--	--	--	--	
Dividends from noncontrolled section 902 corp.....	--	*743	*417	*283	*42	--	*805	*-177	
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--	
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--	
Certain distributions from a FSC or former FSC ²	**	--	--	--	--	--	--	--	
General limitation income.....	*52,041	*40,753	*23,823	*4,367	*9,292	--	*164,577	*4,772	
Section 901(j) income.....	--	--	--	--	--	--	--	--	
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--	
MINING									
All income types	1,673,301	839,572	*54,061	295,441	463,133	*178,756	2,066,788	173,296	
Passive income.....	*1,610	7,295	*131	5,770	*1,085	--	59,630	2,121	
High withholding tax interest.....	*8	*4,904	*29	*3,920	*955	--	*37,973	*3,988	
Financial services income.....	--	--	--	--	--	--	--	--	
Shipping income.....	--	**	--	**	--	--	**	**	
Dividends from noncontrolled section 902 corp.....	*622	*9,697	*1,892	*4,654	*3,151	--	*43,777	*7,844	
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--	
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--	
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--	--	
General limitation income.....	1,671,062	817,676	*52,009	281,096	457,942	*178,756	1,925,756	159,992	
Section 901(j) income.....	--	--	--	--	--	--	**	**	
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--	
UTILITIES									
All income types	596,250	691,665	*398	643,746	*47,061	*10,551	2,192,638	174,190	
Passive income.....	*34,532	43,977	*13	41,322	*2,641	--	354,583	-21,926	
High withholding tax interest.....	* ⁽³⁾	*4,339	--	*1,847	*2,492	--	*8,542	*-254	
Financial services income.....	*24,857	*5,573	--	*5,388	*185	--	*8,505	*-2,409	
Shipping income.....	--	**	--	**	--	--	**	**	
Dividends from noncontrolled section 902 corp.....	*5,074	*33,426	* ⁽³⁾	*31,363	*2,062	--	*76,604	*-23,225	
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--	
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--	
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--	--	
General limitation income.....	531,787	601,180	*385	560,655	*39,681	*10,551	1,741,719	219,320	
Section 901(j) income.....	--	--	--	--	--	--	--	--	
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--	

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type--Continued

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

Industrial division and income type	Foreign income and taxes reported on Form 1118--Continued								
	Deductions--Continued							Taxable income (less loss) before adjustments	Adjustments to taxable income
	Other deductions allocable to specific types of income	Deductions not allocable to specific types of income				Deductions from oil and gas extraction income ⁵			
		Total	Research and development	Interest	Other				
(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)		
CONSTRUCTION									
All income types	77,058	45,019	*415	*8,334	*23,061	--	177,070	20,882	
Passive income.....	*708	*41	*(³)	*(³)	*17	--	8,623	*408	
High withholding tax interest.....	--	*20	--	*2	*2	--	*1,634	--	
Financial services income.....	--	--	--	--	--	--	--	--	
Shipping income.....	--	--	--	--	--	--	--	--	
Dividends from noncontrolled section 902 corp.....	*58	*787	--	*756	*32	--	*2,894	*-227	
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--	
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--	
Certain distributions from a FSC or former FSC ² ...	--	--	--	--	--	--	--	--	
General limitation income.....	76,292	44,171	*415	*7,576	*23,011	--	163,918	*20,700	
Section 901(j) income.....	--	--	--	--	--	--	--	--	
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--	
MANUFACTURING									
All income types	39,069,409	33,984,654	7,230,395	12,813,048	13,585,976	9,069,121	91,703,034	3,963,115	
Passive income.....	378,321	1,045,650	94,891	700,771	238,937	*4	3,771,531	201,145	
High withholding tax interest.....	27,463	73,529	*129	65,748	5,040	--	278,297	20,692	
Financial services income.....	2,162,523	1,729,602	6,795	1,668,795	54,011	--	2,073,674	-11,815	
Shipping income.....	*231,565	80,288	*932	68,692	10,663	--	68,879	-3,047	
Dividends from noncontrolled section 902 corp.....	43,929	387,699	23,451	313,586	40,358	--	1,031,704	-154,766	
Dividends from an IC-DISC or former DISC ¹	*9,387	--	--	--	--	--	*1,606	*-7	
Miscellaneous separately calculated limitation.....	*4,547	*5,643	*142	*2,346	*3,156	--	*-516	*-7,120	
Certain distributions from a FSC or former FSC ² ...	2,935,036	*175	--	--	*175	--	*20,208	*-116	
General limitation income.....	33,276,338	30,647,981	7,103,893	9,979,561	13,233,261	9,069,117	84,427,578	3,921,170	
Section 901(j) income.....	*268	*2,102	*162	*1,863	*78	--	*-1,973	*-3,011	
Income re-sourced by treaty.....	*32	*11,984	--	*11,686	*297	--	*32,049	*-11	
WHOLESALE AND RETAIL TRADE									
All income types	2,042,453	1,468,863	32,916	595,729	786,058	*110,976	4,855,818	565,245	
Passive income.....	8,835	148,610	*29	81,485	56,849	--	152,209	-25,156	
High withholding tax interest.....	*5470	7,665	*3	*4,901	*2,705	--	32,332	*-2,365	
Financial services income.....	*45,173	*28,009	--	*22,626	*4,891	--	*101,614	*-7,753	
Shipping income.....	**	**	**	**	*(³)	**	**	**	
Dividends from noncontrolled section 902 corp.....	*1,680	13,201	*122	6,868	*6,136	--	20,649	-1,904	
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--	
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--	
Certain distributions from a FSC or former FSC ² ...	**	**	**	**	**	--	**	**	
General limitation income.....	1,966,808	1,270,831	32,762	479,303	715,477	*110,976	4,547,594	602,446	
Section 901(j) income.....	--	--	--	--	--	--	--	--	
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--	
TRANSPORTATION AND WAREHOUSING									
All income types	2,279,064	239,751	*17,961	89,798	129,211	--	1,051,003	14,909	
Passive income.....	*254	*3,844	--	*3,443	*392	--	10,598	*1,180	
High withholding tax interest.....	*54	*433	--	*230	*146	--	17,242	*-68	
Financial services income.....	*3,332	*2,447	--	*1,307	*1,141	--	*8,399	*-102	
Shipping income.....	*2,243,208	191,482	*7,580	*58,369	*124,116	--	676,418	*13,726	
Dividends from noncontrolled section 902 corp.....	--	*3,634	*14	*3,421	*198	--	*5,850	*-2,763	
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--	
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--	
Certain distributions from a FSC or former FSC ² ...	--	--	--	--	--	--	--	--	
General limitation income.....	32,215	37,911	*10,367	23,029	3,217	--	332,495	*2,936	
Section 901(j) income.....	--	--	--	--	--	--	--	--	
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--	

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type--Continued

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

Industrial division and income type	Foreign income and taxes reported on Form 1118--Continued							
	Deductions--Continued						Taxable income (less loss) before adjustments	Adjustments to taxable income
	Other deductions allocable to specific types of income	Deductions not allocable to specific types of income				Deductions from oil and gas extraction income ⁵		
		Total	Research and development	Interest	Other			
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
INFORMATION								
All income types	8,835,447	7,277,711	2,140,229	997,890	4,055,860	--	11,290,825	3,462,969
Passive income.....	11,666	64,743	*5,137	54,111	5,219	--	774,401	4,441
High withholding tax interest.....	*42	*3,517	--	*3,464	*53	--	*4,498	-88
Financial services income.....	*18,478	*1,092	*91	*674	*327	--	*142	*-1,148
Shipping income.....	*53,454	*22,689	*1,044	*10,742	*10,903	--	*65,128	*65,126
Dividends from noncontrolled section 902 corp.....	*22,577	49,610	*222	*49,105	*182	--	499,417	*-18,175
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	**	**	**	**	--	**	**
Certain distributions from a FSC or former FSC ²	*211,560	*245	--	--	*245	--	*28,695	*9,904
General limitation income.....	8,517,670	7,134,489	2,133,420	878,837	4,038,876	--	9,890,637	3,402,884
Section 901(j) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--
FINANCE, INSURANCE, AND REAL ESTATE								
All income types	15,439,991	18,632,680	*55,721	11,746,321	6,139,091	--	18,729,319	1,775,390
Passive income.....	12,629	9,333	--	4,935	1,510	--	147,164	66
High withholding tax interest.....	91,908	190,767	*5	156,329	33,611	--	505,753	34,533
Financial services income.....	14,782,261	17,720,045	*8,793	11,500,141	5,874,451	--	17,438,749	1,677,147
Shipping income.....	--	**	--	**	--	--	**	**
Dividends from noncontrolled section 902 corp.....	*9,549	36,802	*1	25,678	*9,043	--	152,925	-9,375
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	**	--	--	--	--	--	--	--
General limitation income.....	522,431	675,663	*46,923	59,167	220,476	--	461,856	61,124
Section 901(i) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--	--
SERVICES								
All income types	17,500,670	31,019,368	319,766	22,277,952	7,568,575	--	14,879,407	325,967
Passive income.....	3,484	35,000	*54	20,402	4,957	--	283,191	6,502
High withholding tax interest.....	12,001	603,085	*2,107	510,236	90,093	--	578,827	3,278
Financial services income.....	13,863,088	28,751,801	*182,497	21,134,901	6,682,466	--	8,417,548	47,685
Shipping income.....	*89,330	*4,160	--	*137	*4,022	--	*-1,319	*-1,534
Dividends from noncontrolled section 902 corp.....	*1,012	119,580	*28	80,034	24,028	--	566,823	-35,204
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	*87,055	*19,616	--	*12,294	*7,322	--	*13,085	*-6,787
General limitation income.....	3,444,700	1,486,127	135,080	519,947	755,686	--	5,016,068	312,027
Section 901(i) income.....	--	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	**	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type--Continued

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

Industrial division and income type	Foreign income and taxes reported on Form 1118--Continued						
	Taxable income (less loss) after adjustments	Foreign taxes available for credit				Paid or accrued	
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Total	Taxes withheld at source on dividends
	(25)	(26)	(27)	(28)	(29)	(30)	(31)
ALL INDUSTRIES							
All income types.....	136,635,990	47,575,987	2,476,970	9,368,659	40,684,298	13,608,822	2,193,964
Passive income.....	5,398,410	674,146	--	43,399	630,747	209,959	60,020
High withholding tax interest.....	1,405,386	423,071	--	85,551	337,520	289,842	8,170
Financial services income.....	26,347,026	6,015,291	--	225,381	5,789,909	3,634,347	236,024
Shipping income.....	747,254	134,982	--	*9,389	125,593	84,388	*2,120
Dividends from noncontrolled section 902 corp.....	2,639,419	1,514,762	*17	509,415	1,005,365	66,645	65,781
Dividends from an IC-DISC or former DISC ¹	*1,613	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	*34,487	--	*1,121	--	*1,121	--	--
Certain distributions from a FSC or former FSC ²	*58,986	*90	--	--	*90	--	--
General limitation income.....	99,964,827	38,804,728	2,475,831	8,495,176	32,785,383	9,322,498	1,821,761
Section 901(j) income.....	*1,339	--	--	--	--	--	--
Income re-sourced by treaty.....	*37,244	*8,918	--	*349	*8,569	*1,143	*89
AGRICULTURE, FORESTRY, FISHING, AND HUNTING							
All income types.....	166,049	63,034	--	*2,694	60,340	16,414	1,798
Passive income.....	5,263	204	--	--	204	*145	*8
High withholding tax interest.....	--	--	--	--	--	--	--
Financial services income.....	--	--	--	--	--	--	--
Shipping income.....	--	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	*982	*1,826	--	*1,418	*408	*77	*77
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	*159,805	*61,004	--	*1,275	*59,729	*16,191	*1,712
Section 901(j) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--
MINING							
All income types.....	1,893,492	1,022,018	*320,756	578,481	764,294	646,320	12,727
Passive income.....	57,509	3,831	--	*241	3,590	1,467	*108
High withholding tax interest.....	*33,985	*9,712	--	*3,517	*6,195	*4,109	--
Financial services income.....	--	--	--	--	--	--	--
Shipping income.....	--	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	*35,933	*28,224	--	*11,688	*16,537	*260	*260
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	1,765,764	980,251	*320,756	563,036	737,972	640,484	12,359
Section 901(j) income.....	**	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--
UTILITIES							
All income types.....	2,018,449	846,283	*2,214	46,850	801,647	165,499	51,114
Passive income.....	376,509	52,243	--	*1,950	50,293	47,730	*842
High withholding tax interest.....	*8,797	*2,186	--	*45	*2,141	*2,141	--
Financial services income.....	*10,914	*1,863	--	*519	*1,344	*1,145	*132
Shipping income.....	--	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	*99,829	*29,545	--	*7,930	*21,616	*1,659	*1,659
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	1,522,399	760,445	*2,214	*36,406	726,253	112,824	*48,481
Section 901(j) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type--Continued

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

Industrial division and income type	Foreign income and taxes reported on Form 1118--Continued						
	Taxable income (less loss) after adjustments	Foreign taxes available for credit				Paid or accrued	
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Total	Taxes withheld at source on dividends
	(25)	(26)	(27)	(28)	(29)	(30)	(31)
CONSTRUCTION							
All income types	156,188	67,637	--	10,919	56,718	25,220	651
Passive income.....	8,215	393	--	*17	376	376	51
High withholding tax interest.....	*1,634	*167	--	--	*167	*167	--
Financial services income.....	--	--	--	--	--	--	--
Shipping income.....	--	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	*3,120	*1,061	--	*145	*915	*32	*(3)
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	143,218	66,017	--	10,757	55,260	24,644	599
Section 901(j) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--
MANUFACTURING							
All income types	87,739,919	33,251,300	2,151,029	7,255,155	28,147,174	7,011,736	1,651,031
Passive income.....	3,570,386	422,271	--	22,382	399,889	91,977	37,891
High withholding tax interest.....	257,605	55,704	--	12,249	43,455	40,334	*304
Financial services income.....	2,085,489	856,248	--	*58,579	797,669	458,562	*51,808
Shipping income.....	71,925	*15,911	--	*8,402	*7,509	*1,184	*592
Dividends from noncontrolled section 902 corp.....	1,186,469	845,136	*17	310,253	534,900	31,314	30,553
Dividends from an IC-DISC or former DISC ¹	*1,613	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	*6,604	--	*1,121	--	*1,121	--	--
Certain distributions from a FSC or former FSC ²	*20,323	*90	--	--	*90	--	--
General limitation income.....	80,506,408	31,048,077	2,149,890	6,842,940	26,355,026	6,388,275	1,529,795
Section 901(i) income.....	*1,038	--	--	--	--	--	--
Income re-sourced by treaty.....	*32,059	*7,864	--	*349	*7,515	*89	*89
WHOLESALE AND RETAIL TRADE							
All income types	4,290,573	1,554,476	*137	361,988	1,192,625	445,015	102,024
Passive income.....	177,365	33,104	--	5,462	27,642	16,676	7,370
High withholding tax interest.....	34,698	8,675	--	*597	8,078	4,636	--
Financial services income.....	*109,367	*21,606	--	*170	*21,436	*13,814	*2,422
Shipping income.....	**	**	--	--	**	**	**
Dividends from noncontrolled section 902 corp.....	22,554	20,951	--	9,129	11,823	1,765	1,765
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	3,945,148	1,469,126	*137	346,630	1,122,633	407,495	89,838
Section 901(j) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--
TRANSPORTATION AND WAREHOUSING							
All income types	1,036,094	188,793	--	13,159	175,634	111,160	3,926
Passive income.....	9,418	1,247	--	*264	983	295	*59
High withholding tax interest.....	17,311	1,864	--	*23	1,841	1,841	--
Financial services income.....	*8,501	*1,273	--	*316	*957	*957	*957
Shipping income.....	662,692	117,920	--	*987	116,933	*82,575	*899
Dividends from noncontrolled section 902 corp.....	*8,613	*4,164	--	*1,759	*2,404	*762	*762
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	329,559	62,326	--	9,811	52,516	24,730	1,250
Section 901(j) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type--Continued

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

Industrial division and income type	Foreign income and taxes reported on Form 1118--Continued						
	Taxable income (less loss) after adjustments	Foreign taxes available for credit				Paid or accrued	
		Total	Reduction for certain foreign taxes	Carryover	Total paid, accrued, and deemed paid	Total	Taxes withheld at source on dividends
	(25)	(26)	(27)	(28)	(29)	(30)	(31)
INFORMATION							
All income types	7,827,856	2,768,786	*508	307,774	2,461,519	1,186,527	99,077
Passive income.....	769,959	74,855	--	*806	74,050	29,096	4,388
High withholding tax interest.....	*4,587	*773	--	*9	*765	*765	--
Financial services income.....	*1,290	*2	--	--	*2	*2	*2
Shipping income.....	*1	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	517,591	178,627	--	*38,097	140,530	*18,527	*18,527
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	**	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	*18,791	--	--	--	--	--	--
General limitation income.....	6,487,753	2,514,528	*508	268,863	2,246,172	1,138,137	76,159
Section 901(j) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--
FINANCE, INSURANCE, AND REAL ESTATE							
All income types	16,953,929	3,343,076	--	241,484	3,101,592	1,730,942	131,904
Passive income.....	147,098	23,276	--	5,230	18,046	12,246	7,774
High withholding tax interest.....	471,221	107,988	--	9,740	98,247	88,762	*124
Financial services income.....	15,761,602	2,983,244	--	141,425	2,841,819	1,580,934	118,476
Shipping income.....	**	**	--	--	**	--	--
Dividends from noncontrolled section 902 corp.....	162,299	112,374	--	58,977	53,397	1,863	1,793
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	400,732	116,174	--	26,111	90,062	47,137	3,737
Section 901(j) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--
SERVICES							
All income types	14,553,440	4,470,585	*2,326	550,156	3,922,755	2,269,990	139,713
Passive income.....	276,688	62,723	--	7,047	55,676	9,950	1,529
High withholding tax interest.....	575,549	236,002	--	59,371	176,630	147,087	*7,741
Financial services income.....	8,369,863	2,151,054	--	*24,373	2,126,681	1,578,934	62,227
Shipping income.....	*215	*117	--	--	*117	--	--
Dividends from noncontrolled section 902 corp.....	602,028	292,854	--	70,019	222,835	10,385	10,385
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	*19,871	--	--	--	--	--	--
General limitation income.....	4,704,042	1,726,781	*2,326	389,346	1,339,762	522,581	57,831
Section 901(i) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	**	**	--	--	**	**	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type--Continued

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

Industrial division and income type	Foreign income and taxes reported on Form 1118--Continued						Taxes deemed paid
	Foreign taxes available for credit--Continued						
	Paid or accrued--Continued						
	Taxes withheld at source on--		Other taxes paid or accrued on--				
Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income		
(32)	(33)	(34)	(35)	(36)	(37)	(38)	
ALL INDUSTRIES							
All income types.....	784,126	2,213,430	4,861,563	8,524	387,240	3,159,976	27,075,476
Passive income.....	31,672	25,052	5,805	*69	*463	86,878	420,788
High withholding tax interest.....	281,672	--	--	--	--	--	47,678
Financial services income.....	338,852	17,739	1,925,241	*64	48,015	1,068,411	2,155,563
Shipping income.....	*1,657	*2,574	*15,701	--	*61,735	*601	41,205
Dividends from noncontrolled section 902 corp.....	*7	*358	*53	* ^(e)	--	446	938,720
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	*1,121
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	*90
General limitation income.....	130,265	2,167,707	2,914,763	8,391	*277,026	2,002,585	23,462,885
Section 901(j) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	*1,054	*7,426
AGRICULTURE, FORESTRY, FISHING, AND HUNTING							
All income types.....	*965	*3,047	*8,276	--	*21	*2,307	*43,927
Passive income.....	*1	*134	--	--	--	*3	*59
High withholding tax interest.....	--	--	--	--	--	--	--
Financial services income.....	--	--	--	--	--	--	--
Shipping income.....	--	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	--	--	--	--	--	--	*330
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	*964	*2,913	*8,276	--	*21	*2,304	*43,538
Section 901(j) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--
MINING							
All income types.....	10,429	15,307	256,348	--	25,385	326,124	117,974
Passive income.....	*601	--	*46	--	--	*712	*2,123
High withholding tax interest.....	*4,109	--	--	--	--	--	*2,087
Financial services income.....	--	--	--	--	--	--	--
Shipping income.....	--	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	--	--	--	--	--	--	*16,277
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	5,719	15,307	256,301	--	25,385	325,412	97,488
Section 901(j) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--
UTILITIES							
All income types.....	13,358	--	*2,967	--	*2,521	*95,539	636,148
Passive income.....	*84	--	--	--	--	*46,804	2,563
High withholding tax interest.....	*2,141	--	--	--	--	--	--
Financial services income.....	--	--	*1,013	--	--	--	*200
Shipping income.....	--	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	--	--	--	--	--	--	*19,957
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	*11,132	--	*1,955	--	*2,521	*48,735	613,429
Section 901(j) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type--Continued

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

Industrial division and income type	Foreign income and taxes reported on Form 1118--Continued						Taxes deemed paid
	Foreign taxes available for credit--Continued						
	Paid or accrued--Continued						
	Taxes withheld at source on--		Other taxes paid or accrued on--				
Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income		
(32)	(33)	(34)	(35)	(36)	(37)	(38)	
CONSTRUCTION							
All income types.....	*553	1,240	*3,023	--	8,328	11,426	*31,498
Passive income.....	*119	*39	--	--	--	*166	--
High withholding tax interest.....	*167	--	--	--	--	--	--
Financial services income.....	--	--	--	--	--	--	--
Shipping income.....	--	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	--	--	--	--	--	*32	*883
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	*266	*1,201	*3,023	--	8,328	11,228	*30,615
Section 901(i) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--
MANUFACTURING							
All income types.....	153,943	1,408,089	1,877,298	2,726	118,969	1,799,680	21,135,438
Passive income.....	18,177	11,298	4,247	*69	*322	19,975	307,912
High withholding tax interest.....	40,030	--	--	--	--	--	*3,120
Financial services income.....	*1,192	*858	*24,961	--	*4,692	*375,051	339,107
Shipping income.....	*126	--	*32	--	--	*435	*6,325
Dividends from noncontrolled section 902 corp.....	*7	*310	*53	--	--	*392	503,585
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	*1,121
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	*90
General limitation income.....	94,411	1,395,624	1,848,005	2,657	113,955	1,403,827	19,966,751
Section 901(i) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	*7,426
WHOLESALE AND RETAIL TRADE							
All income types.....	15,176	80,222	199,476	*259	8,526	39,332	747,611
Passive income.....	2,922	5,645	*103	--	--	636	10,966
High withholding tax interest.....	4,636	--	--	--	--	--	*3,443
Financial services income.....	*2,003	--	*1,553	--	--	*7,835	*7,623
Shipping income.....	--	--	--	--	--	--	**
Dividends from noncontrolled section 902 corp.....	--	--	--	*(3)	--	--	10,057
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	5,616	74,577	197,820	*259	8,526	30,860	715,138
Section 901(i) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--
TRANSPORTATION AND WAREHOUSING							
All income types.....	3,827	*3,173	27,677	*590	70,671	*1,294	64,475
Passive income.....	*220	*9	--	--	--	*7	*688
High withholding tax interest.....	1,841	--	--	--	--	--	--
Financial services income.....	--	--	--	--	--	--	--
Shipping income.....	*1,531	*2,574	*15,669	--	*61,735	*166	*34,358
Dividends from noncontrolled section 902 corp.....	--	--	--	--	--	--	*1,642
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	*235	*590	*12,008	*590	8,936	*1,121	27,786
Section 901(i) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 2.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Industrial Division (by NAICS Classification) and Income Type--Continued

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

Industrial division and income type	Foreign income and taxes reported on Form 1118--Continued						Taxes deemed paid
	Foreign taxes available for credit--Continued						
	Paid or accrued--Continued						
	Taxes withheld at source on--		Other taxes paid or accrued on--				
Interest	Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	Other income		
(32)	(33)	(34)	(35)	(36)	(37)	(38)	
INFORMATION							
All income types	8,481	566,532	333,290	*2,161	22,774	154,212	1,274,993
Passive income.....	6,106	4,262	*41	--	--	14,297	44,954
High withholding tax interest.....	*765	--	--	--	--	--	--
Financial services income.....	--	--	--	--	--	--	--
Shipping income.....	--	--	--	--	--	--	--
Dividends from noncontrolled section 902 corp.....	--	--	--	--	--	--	122,003
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	1,610	562,270	333,249	*2,161	22,774	139,915	1,108,036
Section 901(i) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--
FINANCE, INSURANCE, AND REAL ESTATE							
All income types	362,150	21,930	661,282	*64	43,908	509,705	1,370,650
Passive income.....	934	845	*104	--	--	2,590	5,800
High withholding tax interest.....	88,638	--	--	--	--	--	*9,485
Financial services income.....	272,190	13,324	638,868	*64	36,523	501,488	1,260,885
Shipping income.....	--	--	--	--	--	--	**
Dividends from noncontrolled section 902 corp.....	--	*49	--	--	--	*21	51,534
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	388	7,712	22,310	--	7,385	5,606	42,925
Section 901(i) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	--	--
SERVICES							
All income types	215,244	113,889	1,491,927	*2,724	86,138	220,357	1,652,764
Passive income.....	2,508	2,820	*1,264	--	*142	1,688	45,725
High withholding tax interest.....	139,346	--	--	--	--	--	*29,543
Financial services income.....	63,468	*3,557	1,258,846	--	*6,800	184,037	547,748
Shipping income.....	--	--	--	--	--	--	*117
Dividends from noncontrolled section 902 corp.....	--	--	--	--	--	--	212,450
Dividends from an IC-DISC or former DISC ¹	--	--	--	--	--	--	--
Miscellaneous separately calculated limitation.....	--	--	--	--	--	--	--
Certain distributions from a FSC or former FSC ²	--	--	--	--	--	--	--
General limitation income.....	9,922	107,513	231,817	*2,724	79,196	33,578	817,181
Section 901(i) income.....	--	--	--	--	--	--	--
Income re-sourced by treaty.....	--	--	--	--	--	**	--

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

** 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 Less than \$500.

⁴ Included in gross income (less loss), columns 2-8.

⁵ Included in deductions, columns 12-21.

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

Corporate Foreign Tax Credit, 1998

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Selected Country to Which Foreign Tax Was Paid

[All figures are estimates based on samples--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 resulting from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
All countries.....	5,927	349,386,789	60,541,096	27,074,099	68,413,782	55,875,295
Canada.....	1,779	23,852,124	5,563,762	3,716,981	4,048,835	2,932,801
Latin America, total.....	1,301	40,563,434	7,249,626	1,933,814	11,644,780	3,672,998
Mexico.....	869	10,793,027	2,043,470	764,394	2,652,695	1,127,290
Central America, total.....	283	1,943,735	536,679	93,634	372,342	194,956
Belize.....	30	27,369	*877	*14	*6,507	*37
Costa Rica.....	137	264,983	18,586	4,925	17,137	36,745
El Salvador.....	107	170,816	9,499	*3,065	34,105	7,876
Guatemala.....	145	350,406	27,817	9,065	57,670	52,719
Honduras.....	84	87,192	6,869	*3,537	15,080	4,547
Nicaragua.....	48	43,078	*10,500	*2,945	*1,560	1,453
Panama.....	183	968,766	462,524	70,080	240,184	66,000
Central America not allocable.....	4	*31,124	*6	*3	*99	*25,580
Caribbean countries, total.....	359	4,214,736	1,270,381	114,350	1,250,479	219,475
Cayman Islands (British).....	170	2,467,956	1,003,097	76,754	1,128,471	164,728
Dominican Republic.....	149	314,076	74,920	*21,561	63,586	20,511
Haiti.....	35	67,385	*5,009	*802	*7,852	*933
Jamaica.....	104	128,487	*3,612	*4,178	27,613	11,124
Trinidad and Tobago.....	113	677,767	32,586	*4,922	15,229	8,477
Other Caribbean countries.....	112	559,065	151,158	6,133	7,729	13,701
South America, total.....	870	21,161,837	3,399,096	961,436	7,064,825	1,937,088
Argentina.....	486	6,223,558	549,970	217,638	2,599,215	380,608
Bolivia.....	95	154,741	*7,774	*2,646	56,590	7,473
Brazil.....	550	7,893,023	1,964,595	503,993	2,566,876	933,427
Chile.....	314	2,313,341	279,024	36,093	766,458	152,889
Colombia.....	310	1,555,551	149,914	69,917	222,553	147,361
Ecuador.....	177	197,293	19,105	4,846	75,746	21,386
Paraguay.....	57	79,288	*198	*21	*52,996	6,429
Peru.....	243	607,446	18,010	14,586	134,352	50,643
Uruguay.....	114	306,142	27,534	7,218	123,102	27,229
Venezuela.....	350	1,759,462	382,943	104,477	462,148	207,291
Other South America.....	43	71,992	*28	--	*4,789	2,352
Latin America not allocable.....	22	2,450,100	--	--	*304,439	*194,189
Other Western Hemisphere, total.....	339	6,872,801	2,230,644	172,249	2,347,205	70,316
Bahamas.....	97	1,350,512	146,571	12,187	1,146,217	6,743
Bermuda.....	210	3,429,865	1,688,179	120,948	1,057,733	6,330
Netherlands Antilles.....	81	377,520	132,943	18,099	49,157	39,694
Other British West Indies.....	119	462,459	261,329	19,863	65,887	11,387
All other Western Hemisphere.....	62	1,252,446	*1,622	*1,152	28,211	6,163
Europe, total.....	2,419	141,323,557	31,533,478	15,573,111	25,187,378	24,707,447
European Union, total.....	2,355	128,330,371	28,935,936	14,698,942	22,679,937	22,269,270
Austria.....	241	893,866	210,834	85,553	80,435	304,788
Belgium.....	365	5,827,425	932,290	314,391	813,332	836,596
Denmark.....	277	1,074,194	241,430	96,710	77,058	295,950
Finland.....	243	867,691	90,427	38,605	82,118	272,775
France.....	597	9,476,174	1,530,680	821,145	788,762	2,640,491
Germany.....	709	19,583,288	5,446,733	2,878,564	987,875	3,741,322
Greece.....	179	893,030	40,038	24,860	363,852	238,180
Ireland.....	303	5,414,442	1,186,665	175,897	247,889	3,378,872
Italy.....	542	6,673,809	1,439,785	1,552,213	754,918	1,355,190
Luxembourg.....	96	1,579,950	569,079	874,653	50,207	72,170

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Selected Country to Which Foreign Tax Was Paid--Continued

[All figures are estimates based on samples--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 resulting from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
Europe--continued						
European Union--continued						
Netherlands.....	893	12,822,873	5,014,783	2,331,361	537,585	2,641,845
Portugal.....	201	555,898	143,838	55,281	43,034	152,001
Spain.....	535	3,493,856	1,032,472	431,233	247,933	1,144,001
Sweden.....	353	2,349,243	787,195	409,481	227,791	431,364
United Kingdom.....	1,363	56,793,961	10,269,687	4,608,994	17,377,147	4,763,310
European Union, not allocable.....	4	*30,671	--	--	--	*414
Other West European countries, total.....	576	9,052,279	2,333,071	774,312	2,006,093	1,333,160
Liechtenstein.....	11	*17,592	*13,305	*301	*742	*88
Monaco.....	18	29,601	*14,333	*10	*979	*187
Norway.....	227	1,913,815	170,334	107,435	209,868	191,755
Switzerland.....	476	5,201,099	2,051,281	628,593	354,587	963,768
Turkey.....	177	1,828,052	83,184	37,500	1,430,805	166,267
Other West European countries.....	67	61,412	*635	*473	8,452	11,048
West European countries not allocable.....	**	**	--	--	**	**
East European countries, total.....	381	3,065,052	263,739	99,833	494,932	985,211
Romania.....	65	88,349	*1,659	*364	19,749	22,994
Former Soviet Union.....	244	893,109	94,229	22,183	330,589	125,921
Other East European countries.....	280	2,083,593	167,852	77,286	144,593	836,296
Europe not allocable.....	31	875,856	*732	*23	*6,417	119,807
Africa, total.....	499	4,589,999	484,965	185,125	436,941	517,459
North Africa, total.....	174	1,166,415	62,589	20,813	133,714	86,535
Algeria.....	30	89,077	*10,632	*10,553	*3,081	*1,501
Egypt.....	138	965,657	45,438	7,226	91,619	78,442
Libya.....	5	*473	--	--	--	--
Morocco.....	65	47,401	*728	*356	11,159	6,125
Other North Africa.....	43	63,808	*5,792	*2,677	27,855	*467
East Africa, total.....	111	227,485	24,914	8,672	35,847	30,802
Ethiopia.....	18	41,645	--	--	*1,437	*2,662
Kenya.....	60	91,689	*5,000	*2,496	29,042	7,941
Tanzania.....	17	1,066	--	--	--	*334
Uganda.....	15	3,152	*1,317	*657	*6	*213
Other East Africa.....	76	89,933	18,596	*5,519	5,363	19,652
West and Central Africa, total.....	157	2,155,415	299,923	78,588	68,597	87,119
Gabon.....	44	27,624	*15,240	*1,454	*3,495	*122
Ghana.....	27	90,706	*28,028	*13,618	*384	*112
Liberia.....	33	130,031	86,140	*2,024	27,428	--
Nigeria.....	66	1,075,925	163,215	58,794	9,679	62,502
Zaire.....	10	*67,869	*502	*126	*508	*759
Other West and Central Africa.....	81	898,999	*6,799	*2,573	27,103	23,869
Southern Africa, total.....	352	1,038,945	97,539	77,053	197,396	312,932
Malawi.....	10	*4,233	*1,917	*1,269	--	*99
Zimbabwe.....	48	25,528	9,855	9,952	*226	2,807
South Africa (including Namibia).....	342	956,674	83,212	64,083	195,962	271,589
Zambia.....	22	10,764	*840	*1,123	*102	*1,129
Other Southern Africa.....	17	41,747	*1,715	*626	*1,105	*37,307
Africa not allocable.....	8	*1,739	--	--	*1,386	*70

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Selected Country to Which Foreign Tax Was Paid--Continued

[All figures are estimates based on samples--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 resulting from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees
(1)	(2)	(3)	(4)	(5)	(6)	
Asia, total.....	1,649	67,986,812	5,895,283	3,778,228	12,534,280	15,768,639
Middle East, total.....	426	4,746,724	271,829	87,976	646,134	539,311
Bahrain.....	63	388,924	*12,653	*384	298,724	1,006
Iran.....	17	12,012	*1,340	--	--	*1,066
Iraq.....	7	*10,745	--	--	*129	--
Israel.....	265	1,100,279	118,346	35,664	114,153	139,710
Kuwait.....	107	134,074	*1,714	*285	*416	15,963
Lebanon.....	64	55,077	*457	*29	*17,741	16,321
Qatar.....	59	101,177	--	--	18,128	5,919
Saudi Arabia.....	158	1,592,022	76,055	32,254	52,421	221,528
United Arab Emirates.....	124	672,316	38,441	*9,436	121,448	29,844
Other areas of the Arabian Peninsula.....	67	404,993	*11,485	*9,532	*11,518	23,348
Other Middle East.....	98	275,105	11,338	*392	11,457	84,604
Southern and Southeast Asia, total.....	797	18,421,135	1,493,658	542,730	3,830,110	4,914,497
Bangladesh.....	28	42,293	--	--	*18,297	*181
India.....	323	1,245,921	45,256	36,247	397,428	83,062
Indonesia.....	286	3,759,952	269,020	187,342	683,100	119,414
Malaysia.....	314	1,513,932	77,183	25,568	291,249	244,810
Pakistan.....	89	367,704	4,471	*2,330	204,166	4,326
Philippines.....	263	1,743,162	405,185	123,311	469,837	126,604
Singapore.....	444	7,279,021	478,428	102,864	1,170,370	3,767,037
Sri Lanka.....	48	68,427	*5,468	*1,467	*10,180	30,335
Thailand.....	327	2,189,209	205,974	62,637	494,110	516,152
Vietnam.....	57	46,425	*148	*32	*17,764	1,401
Other Southern and Southeast Asia.....	50	165,089	*2,526	*931	73,608	21,175
Eastern Asia, total.....	1,379	40,884,803	4,129,774	3,147,518	5,455,910	9,939,594
China.....	377	1,895,819	83,298	13,167	136,837	538,606
Hong Kong.....	457	6,717,780	1,108,617	299,496	2,085,930	422,757
Japan.....	1,109	18,803,324	2,336,763	2,553,508	1,250,555	7,067,258
South Korea.....	387	3,033,256	281,698	194,702	950,475	888,259
Taiwan.....	360	4,633,471	319,355	86,645	1,010,187	1,021,434
Other Eastern Asia.....	32	5,801,153	*42	--	*21,925	*1,280
Asia not allocable.....	39	3,934,151	*22	*3	*2,602,126	*375,238
Oceania, total.....	878	10,955,550	2,472,660	1,286,448	1,551,212	1,325,536
Australia.....	830	9,391,370	2,101,674	1,093,783	1,353,537	1,179,089
New Zealand.....	330	1,074,640	338,324	191,171	157,360	137,011
Other Oceania.....	63	489,539	*32,662	*1,494	40,316	9,435
Puerto Rico and U.S. Possessions, total.....	449	6,068,415	359,358	75,446	1,344,369	1,681,336
Puerto Rico.....	398	5,170,569	285,146	39,772	1,006,771	1,670,845
U.S. Possessions, total.....	156	897,845	74,212	*35,674	337,598	10,492
American Samoa.....	17	10,709	--	--	*6,918	*250
Guam.....	104	390,843	*36,954	*18,355	139,098	4,484
Virgin Islands.....	84	363,068	*23,507	*11,523	126,862	3,612
Other U.S. Possessions.....	28	133,226	*13,751	*5,796	64,721	*2,145
Country not stated.....	2,890	43,793,002	1,370,315	352,607	9,318,782	5,198,234
Foreign Sales Corporation dividends ¹.....	72	3,370,102	3,370,012	*90	--	--
Interest-Charge Domestic International Sales Corporation dividends ¹.....	5	*10,993	*10,993	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Selected Country to Which Foreign Tax Was Paid--Continued

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

Selected country	Foreign income and taxes reported on Form 1118--Continued					
	Gross income (less loss)--Continued		Oil and gas extraction income (less loss) ²	Foreign branch income ²	Specifically allocable income [section 863(b)] ²	Total deductions
	Service income	Other income				
	(7)	(8)	(9)	(10)	(11)	(12)
All countries.....	23,414,004	114,068,512	15,127,351	87,251,267	9,176,112	202,269,920
Canada.....	996,488	6,593,257	517,144	2,875,140	750,542	10,450,401
Latin America, total.....	4,247,751	11,814,466	761,005	12,796,437	289,954	25,234,836
Mexico.....	720,557	3,484,620	*-4	2,956,277	190,403	6,040,618
Central America, total.....	115,254	630,870	*17	569,013	4,424	1,057,421
Belize.....	*146	19,788	--	*13,798	*106	27,512
Costa Rica.....	6,155	181,436	--	63,918	1,033	107,835
El Salvador.....	13,388	102,884	--	59,592	*247	99,377
Guatemala.....	65,287	137,847	*17	136,752	456	245,929
Honduras.....	10,857	46,301	--	35,707	*144	52,476
Nicaragua.....	*1,287	25,333	--	16,256	*63	14,400
Panama.....	18,133	111,845	--	232,556	*569	481,346
Central America not allocable.....	--	*5,436	--	*10,432	*1,806	*28,547
Caribbean countries, total.....	383,340	976,712	*401,947	1,171,626	8,337	2,394,367
Cayman Islands (British).....	13,328	81,578	*-2,945	609,644	*10	1,177,752
Dominican Republic.....	14,880	118,618	--	103,342	*426	153,783
Haiti.....	*12,840	39,949	--	*27,208	*6	45,479
Jamaica.....	27,479	54,481	--	60,477	*156	96,031
Trinidad and Tobago.....	108,121	508,434	*404,892	167,862	*666	523,823
Other Caribbean countries.....	206,692	173,651	--	203,092	*7,073	397,499
South America, total.....	1,141,611	6,657,781	359,045	6,292,348	86,790	13,537,061
Argentina.....	293,237	2,182,890	*137,233	2,068,253	5,317	4,524,757
Bolivia.....	46,131	34,128	*6	40,119	*405	93,761
Brazil.....	242,702	1,681,430	*849	1,897,649	59,327	4,293,947
Chile.....	114,254	964,623	*184	761,540	1,919	1,572,029
Colombia.....	148,912	816,894	*189,038	709,632	-562	1,031,580
Ecuador.....	9,379	66,830	*400	56,567	*673	113,146
Paraguay.....	4,111	15,533	--	68,362	*3	59,686
Peru.....	53,862	335,993	*945	166,210	*4,777	605,357
Uruguay.....	33,345	87,713	--	140,178	9,521	207,660
Venezuela.....	182,304	420,298	*30,391	355,512	5,000	994,969
Other South America.....	*13,375	51,449	--	28,326	*410	40,170
Latin America not allocable.....	*1,886,988	64,484	--	*1,807,173	--	2,205,369
Other Western Hemisphere, total.....	1,309,192	743,196	*39,442	2,842,852	*3,395	4,263,442
Bahamas.....	16,189	22,605	*2,054	1,121,859	*4	989,133
Bermuda.....	67,847	488,828	*37,388	387,907	*3,386	1,642,062
Netherlands Antilles.....	9,012	128,616	--	*51,040	*3	225,676
Other British West Indies.....	7,500	96,493	--	56,165	*(³)	264,324
All other Western Hemisphere.....	1,208,643	6,654	--	*1,225,881	*1	1,142,247
Europe, total.....	5,580,812	38,741,332	6,487,019	32,915,251	1,986,873	75,167,381
European Union, total.....	4,809,010	34,937,276	5,550,097	29,479,165	1,720,250	67,743,514
Austria.....	17,585	194,671	*67	114,670	*10,464	561,447
Belgium.....	219,558	2,711,257	*172	2,088,174	18,973	3,785,029
Denmark.....	25,672	337,375	*177,905	234,789	*2,049	545,856
Finland.....	19,766	364,000	--	32,244	*32,667	497,735
France.....	334,998	3,360,097	*11,647	1,310,722	124,758	5,668,531
Germany.....	555,713	5,973,080	*17,302	2,887,062	275,005	8,509,038
Greece.....	11,870	214,231	--	418,679	*874	670,085
Ireland.....	188,319	236,799	--	101,135	*39,501	2,289,194
Italy.....	214,834	1,356,868	*38	1,186,180	83,299	3,271,532
Luxembourg.....	2,749	11,090	--	21,913	*8	476,501

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Selected Country to Which Foreign Tax Was Paid--Continued

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

Selected country	Foreign income and taxes reported on Form 1118--Continued					
	Gross income (less loss)--Continued		Oil and gas extraction income (less loss) ²	Foreign branch income ²	Specifically allocable income [section 863(b)] ²	Total deductions
	Service income	Other income				
(7)	(8)	(9)	(10)	(11)	(12)	
Europe--continued						
European Union--continued						
Netherlands.....	244,398	2,052,900	*637,268	585,814	910,479	3,931,780
Portugal.....	22,289	139,455	*243	80,547	*13,130	288,457
Spain.....	91,326	546,892	*-10	457,082	39,297	1,583,095
Sweden.....	107,137	386,276	--	258,037	*36,060	1,018,213
United Kingdom.....	2,752,795	17,022,028	4,705,466	19,675,159	133,687	34,627,653
Other European Economic Community.....	--	*30,258	--	*26,959	--	*19,368
Other West European countries, total.....	256,875	2,348,768	*767,515	2,315,185	10,623	4,439,109
Liechtenstein.....	*891	*2,266	--	--	--	4,673
Monaco.....	*5,973	*8,119	--	*4,997	--	14,544
Norway.....	88,184	1,146,239	767,768	673,288	*-372	1,011,487
Switzerland.....	133,792	1,069,079	--	793,760	*3,876	2,298,939
Turkey.....	24,346	85,950	*-316	842,792	*3,328	1,067,274
Other West European countries.....	3,689	37,115	*63	*348	*3,792	42,164
West European countries not allocable.....	--	--	--	--	--	**
East European countries, total.....	339,382	881,955	*169,407	753,761	221,261	2,468,950
Romania.....	12,062	31,521	*85	*49,793	*-628	64,221
Former Soviet Union.....	129,844	190,344	*169,322	332,098	*1,606	1,164,775
Other East European countries.....	197,476	660,091	--	371,870	*220,283	1,239,954
Europe not allocable.....	*175,544	573,334	--	*367,140	*34,739	515,809
Africa, total.....	671,483	2,294,026	781,514	1,272,890	6,535	3,213,537
North Africa, total.....	113,764	749,000	*414,782	455,611	*1,349	1,169,695
Algeria.....	*33,691	29,619	*13,373	*11,530	*1	171,889
Egypt.....	77,331	665,601	*401,389	359,944	*737	902,470
Libya.....	--	*473	--	*11	--	*3,693
Morocco.....	2,549	26,483	--	*35,906	*612	25,732
Other North Africa.....	*194	26,823	*20	*48,220	--	65,912
East Africa, total.....	17,067	110,183	--	67,035	*1,531	144,045
Ethiopia.....	*93	*37,453	--	*9,476	*5	44,081
Kenya.....	*3,312	43,899	--	40,930	*45	58,057
Tanzania.....	*119	*613	--	*(³)	--	603
Uganda.....	*83	*875	--	--	--	1,689
Other East Africa.....	13,459	27,344	--	*16,629	*1,481	39,615
West and Central Africa, total.....	415,536	1,205,651	*366,732	415,399	*6	1,263,523
Gabon.....	*2,351	5,205	*12,519	*9,089	--	15,671
Ghana.....	*2,728	45,837	--	*13,139	*1	41,347
Liberia.....	*6,617	*7,822	--	*6,671	--	33,516
Nigeria.....	70,547	711,188	*200,961	*43,188	*1	418,039
Zaire.....	*1,425	*-71,189	*5,985	*15	--	*4,744
Other West and Central Africa.....	331,868	506,788	*147,266	343,297	*5	750,205
Southern Africa, total.....	124,953	229,073	--	334,845	3,649	635,132
Malawi.....	*2	*945	--	--	--	*1,719
Zimbabwe.....	*228	2,460	--	*324	*-814	11,678
South Africa (including Namibia).....	124,415	217,414	--	327,523	4,464	600,791
Zambia.....	*297	*7,272	--	*6,992	--	8,934
Other Southern Africa.....	*11	*983	--	*6	--	12,010
Africa not allocable.....	*163	*119	--	--	--	*1,142

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Selected Country to Which Foreign Tax Was Paid--Continued

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

Selected country	Foreign income and taxes reported on Form 1118--Continued					
	Gross income (less loss)--Continued		Oil and gas extraction income (less loss) ²	Foreign branch income ²	Specifically allocable income [section 863(b)] ²	Total deductions
	Service income	Other income				
	(7)	(8)	(9)	(10)	(11)	(12)
Asia, total.....	4,168,955	25,841,428	1,968,136	26,122,956	1,386,111	44,592,033
Middle East, total.....	709,062	2,492,412	*708,014	1,641,987	-50,331	3,480,264
Bahrain.....	20,545	55,613	--	311,976	*56	381,103
Iran.....	--	*9,606	--	--	--	1,055
Iraq.....	--	*10,616	--	*633	--	*3,957
Israel.....	58,187	634,219	--	41,907	*5,849	801,664
Kuwait.....	77,377	38,319	--	32,731	*33	131,683
Lebanon.....	*1,004	19,526	--	*27,468	*2	43,269
Qatar.....	49,119	28,011	*-12,508	22,089	*4	79,573
Saudi Arabia.....	330,550	879,214	*330,382	587,017	*-57,870	1,061,851
United Arab Emirates.....	60,680	412,467	*234,510	361,233	*1,547	554,607
Other areas of the Arabian Peninsula.....	103,122	245,988	*155,630	*151,848	*26	227,277
Other Middle East.....	8,479	158,833	--	105,086	*21	194,227
Southern and Southeast Asia, total.....	1,025,584	6,614,556	1,151,016	5,420,740	433,062	11,364,629
Bangladesh.....	2,119	21,695	--	*28,930	--	30,035
India.....	147,367	536,561	--	376,088	360	935,751
Indonesia.....	88,719	2,412,356	757,085	641,805	*5,881	2,410,181
Malaysia.....	139,182	735,939	*337,544	673,698	32,408	1,001,443
Pakistan.....	4,328	148,083	*20,480	264,606	*628	262,544
Philippines.....	91,994	526,231	*-543	520,567	170,450	977,846
Singapore.....	361,017	1,399,305	*1,278	2,030,849	207,873	4,076,096
Sri Lanka.....	3,804	17,173	--	*21,010	*211	44,204
Thailand.....	132,796	777,540	*35,172	702,483	15,379	1,471,703
Vietnam.....	16,172	10,908	--	*33,306	*-131	40,441
Other Southern and Southeast Asia.....	38,084	28,765	--	127,399	*3	114,384
Eastern Asia, total.....	2,216,376	15,995,632	*109,107	17,587,965	1,002,799	26,126,559
China.....	522,121	601,789	*91,568	604,890	22,958	1,377,521
Hong Kong.....	469,223	2,331,757	--	3,483,993	527,569	4,427,853
Japan.....	764,021	4,831,219	*17,539	4,438,426	332,510	9,691,518
South Korea.....	164,721	553,400	--	973,611	20,253	2,012,432
Taiwan.....	269,789	1,926,060	--	2,353,417	99,510	3,472,676
Other Eastern Asia.....	*26,500	5,751,406	--	*5,733,628	--	5,144,559
Asia not allocable.....	*217,933	738,829	--	1,472,265	*580	3,620,580
Oceania, total.....	694,156	3,625,537	*760,982	3,377,950	28,016	5,364,074
Australia.....	419,505	3,243,782	*717,326	2,886,533	27,037	4,516,789
New Zealand.....	43,236	207,538	*-3	229,188	978	423,692
Other Oceania.....	231,416	174,217	*43,659	*262,229	*1	423,593
Puerto Rico and U.S. Possessions, total.....	749,291	1,858,614	--	2,329,308	42,215	4,156,046
Puerto Rico.....	642,524	1,525,511	--	1,951,090	12,444	3,439,912
U.S. Possessions, total.....	106,767	333,104	--	378,219	*29,771	716,133
American Samoa.....	*950	*2,591	--	*6,811	--	7,282
Guam.....	51,074	140,877	--	242,378	*2,952	287,303
Virgin Islands.....	50,775	146,789	--	116,569	*(³)	280,888
Other U.S. Possessions.....	*3,967	*42,846	--	*12,461	*26,819	140,661
Country not stated.....	4,995,876	22,556,656	3,812,109	2,699,095	4,682,470	26,510,669
Foreign Sales Corporation dividends ¹	--	--	--	--	--	3,308,114
Interest-Charge Domestic International Sales						
Corporation dividends ¹	--	--	--	--	--	*9,387

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Selected Country to Which Foreign Tax Was Paid--Continued

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

Selected country	Foreign income and taxes reported on Form 1118--Continued					
	Deductions from oil and gas extraction income ⁴	Taxable income (less loss) before adjustments	Total	Foreign taxes paid, accrued, and deemed paid		
				Total	Taxes withheld at source on--	
					Dividends	Interest
(13)	(14)	(15)	(16)	(17)	(18)	
All countries.....	9,369,404	147,116,869	40,684,298	13,608,822	2,193,964	784,126
Canada.....	*252,401	13,401,723	4,510,064	793,084	263,751	46,290
Latin America, total.....	724,008	15,328,598	3,864,134	1,930,320	273,471	258,154
Mexico.....	*1,469	4,752,408	1,176,210	411,816	24,567	36,423
Central America, total.....	*53	886,314	149,501	55,867	4,587	357
Belize.....	--	-142	*337	*323	*303	--
Costa Rica.....	--	157,148	19,346	14,421	2,247	*112
El Salvador.....	--	71,439	7,233	4,167	*21	*98
Guatemala.....	*53	104,477	24,944	15,879	*526	*89
Honduras.....	--	34,716	6,774	3,237	*781	*26
Nicaragua.....	--	28,678	4,189	1,244	--	*10
Panama.....	--	487,420	85,348	15,268	*679	*22
Central America not allocable.....	--	*2,577	*1,331	*1,328	*30	--
Caribbean countries, total.....	*354,647	1,820,369	161,198	46,848	5,710	1,281
Cayman Islands (British).....	--	1,290,204	76,754	--	--	--
Dominican Republic.....	--	160,293	39,629	18,069	*2,208	*555
Haiti.....	--	21,906	*6,679	*5,877	*750	--
Jamaica.....	--	32,456	13,515	9,337	*356	*425
Trinidad and Tobago.....	*354,647	153,945	12,960	8,038	*1,626	*19
Other Caribbean countries.....	--	161,565	11,659	5,526	*770	*282
South America, total.....	367,840	7,624,776	2,367,781	1,406,345	238,607	218,578
Argentina.....	*148,594	1,698,800	533,417	315,779	*2,226	38,860
Bolivia.....	*58	60,980	6,074	3,428	*111	*270
Brazil.....	*1,004	3,599,076	1,102,822	598,829	173,855	167,437
Chile.....	*241	741,312	231,082	194,989	51,899	3,812
Colombia.....	*152,370	523,972	225,084	155,167	7,521	*230
Ecuador.....	*6,011	84,147	15,495	10,649	*516	*553
Paraguay.....	*1,855	19,602	8,646	8,625	--	*85
Peru.....	*3,130	2,089	52,901	38,315	*301	850
Uruguay.....	--	98,482	16,018	8,800	--	--
Venezuela.....	*54,578	764,493	166,522	62,045	*2,178	6,480
Other South America.....	--	31,822	*9,719	*9,719	--	--
Latin America not allocable.....	--	244,731	*9,444	*9,444	--	*1,514
Other Western Hemisphere, total.....	*37,235	2,609,359	178,024	5,775	*1,263	*248
Bahamas.....	--	361,379	12,187	--	--	--
Bermuda.....	*37,235	1,787,802	120,948	--	--	--
Netherlands Antilles.....	--	151,844	20,506	*2,407	*609	*154
Other British West Indies.....	--	198,135	21,865	2,002	*653	*94
All other Western Hemisphere.....	--	110,199	*2,518	*1,366	--	--
Europe, total.....	3,000,863	66,156,176	19,954,687	4,380,761	1,110,521	85,032
European Union, total.....	2,326,804	60,586,857	18,473,291	3,773,534	1,026,880	29,222
Austria.....	*41	332,419	103,310	17,757	7,738	*50
Belgium.....	*49	2,042,396	551,402	237,010	30,310	2,135
Denmark.....	*134,848	528,338	147,146	50,436	4,866	*249
Finland.....	--	369,955	51,439	12,834	6,768	*239
France.....	*3,275	3,807,643	1,139,056	317,246	49,742	3,071
Germany.....	*205	11,074,250	3,493,354	614,790	264,204	1,193
Greece.....	*1,740	222,945	62,112	37,252	*28	*5
Ireland.....	*(³)	3,125,248	181,515	5,618	671	*82
Italy.....	*2,729	3,402,276	1,858,647	306,434	54,678	8,640
Luxembourg.....	--	1,103,449	903,334	28,681	*28,618	*5

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Selected Country to Which Foreign Tax Was Paid--Continued

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

Selected country	Foreign income and taxes reported on Form 1118--Continued					
	Deductions from oil and gas extraction income ⁴	Taxable income (less loss) before adjustments	Total	Foreign taxes paid, accrued, and deemed paid		
				Total	Taxes withheld at source on--	
					Dividends	Interest
(13)	(14)	(15)	(16)	(17)	(18)	
Europe--continued						
European Union--continued						
Netherlands.....	*81,090	8,891,093	2,678,123	346,761	134,821	1,473
Portugal.....	--	267,441	84,770	29,489	14,381	425
Spain.....	*287	1,910,761	619,750	188,516	74,776	1,314
Sweden.....	--	1,331,030	485,161	75,681	9,933	*413
United Kingdom.....	2,102,540	22,166,308	6,114,173	1,505,028	345,346	9,928
Other European Economic Community.....	--	*11,303	--	--	--	--
Other West European countries, total.....	*517,402	4,613,170	1,184,948	410,636	71,534	49,876
Liechtenstein.....	--	12,919	*1,279	*977	--	--
Monaco.....	--	15,057	*208	*198	--	--
Norway.....	*513,585	902,328	305,887	198,452	11,409	*21
Switzerland.....	--	2,902,160	708,028	79,434	60,108	1,219
Turkey.....	*134	760,778	166,865	129,365	*14	*48,637
Other West European countries.....	*3,683	19,248	*2,682	*2,209	*3	--
West European countries not allocable.....	--	**	--	--	--	--
East European countries, total.....	*156,656	596,102	295,203	195,370	12,107	5,933
Romania.....	*2,372	24,128	5,879	5,515	*689	*11
Former Soviet Union.....	*154,285	-271,666	168,829	146,646	895	*5,909
Other East European countries.....	--	843,640	120,495	43,209	10,523	*13
Europe not allocable.....	--	360,047	*1,224	*1,221	--	--
Africa, total.....	784,366	1,376,462	563,226	378,101	6,371	495
North Africa, total.....	*543,529	-3,279	68,816	48,003	*57	*(³)
Algeria.....	*84,556	-82,812	*23,388	*12,835	--	--
Egypt.....	*445,352	63,187	36,246	29,020	*5	--
Libya.....	--	*-3,219	--	--	--	--
Morocco.....	--	21,669	5,888	5,531	*52	*(³)
Other North Africa.....	*13,621	-2,104	*3,294	*617	--	*(³)
East Africa, total.....	*(³)	83,440	20,684	12,012	*435	*416
Ethiopia.....	--	-2,436	*1,036	*1,036	--	--
Kenya.....	--	33,632	12,846	10,350	*287	*308
Tanzania.....	--	463	*21	*21	--	--
Uganda.....	--	1,463	*657	--	--	--
Other East Africa.....	*(³)	50,318	6,124	605	*148	*108
West and Central Africa, total.....	*240,837	891,892	320,969	242,381	3,948	*32
Gabon.....	*1,663	11,952	*3,596	*2,142	*521	--
Ghana.....	--	49,358	*13,862	*245	*87	--
Liberia.....	--	96,515	*2,024	--	--	--
Nigeria.....	*34,609	657,886	177,661	118,867	*3,012	*31
Zaire.....	*1,223	-72,613	*857	*731	--	*1
Other West and Central Africa.....	*203,343	148,794	122,969	120,395	*329	--
Southern Africa, total.....	--	403,813	152,757	75,705	1,930	*47
Malawi.....	--	2,514	*1,269	--	--	--
Zimbabwe.....	--	13,850	11,943	1,991	*1,662	--
South Africa (including Namibia).....	--	355,882	132,345	68,262	*160	*47
Zambia.....	--	1,830	*1,908	*785	*45	--
Other Southern Africa.....	--	29,736	*5,292	*4,666	*64	--
Africa not allocable.....	--	*597	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Selected Country to Which Foreign Tax Was Paid--Continued

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

Selected country	Foreign income and taxes reported on Form 1118--Continued					
	Deductions from oil and gas extraction income ⁴	Taxable income (less loss) before adjustments	Total	Foreign taxes paid, accrued, and deemed paid		
				Total	Foreign taxes paid or accrued	
					Dividends	Interest
(13)	(14)	(15)	(16)	(17)	(18)	
Asia, total.....	1,436,351	23,394,780	7,685,244	3,906,863	373,124	237,731
Middle East, total.....	*639,401	1,266,459	342,622	254,646	13,547	602
Bahrain.....	--	7,822	*547	*163	--	--
Iran.....	--	10,957	--	--	--	--
Iraq.....	--	*6,788	--	--	--	--
Israel.....	--	298,615	62,546	26,882	13,165	527
Kuwait.....	*11,862	2,391	7,228	6,943	--	--
Lebanon.....	--	11,808	1,064	1,035	*14	*41
Qatar.....	*447	21,605	*3,770	*3,770	--	--
Saudi Arabia.....	*347,612	530,171	152,264	120,010	*352	*34
United Arab Emirates.....	*190,201	117,708	41,396	31,960	--	--
Other areas of the Arabian Peninsula.....	*89,278	177,716	68,703	59,171	--	--
Other Middle East.....	--	80,878	5,103	4,710	*17	--
Southern and Southeast Asia, total.....	745,595	7,056,506	1,848,368	1,305,484	95,124	44,579
Bangladesh.....	*263	12,258	*2,350	*2,350	--	--
India.....	--	310,170	140,596	104,349	908	*70
Indonesia.....	324,367	1,349,771	827,517	640,175	9,344	10,188
Malaysia.....	*392,408	512,489	153,094	127,526	1,078	918
Pakistan.....	*17,384	105,160	27,549	25,219	*155	*36
Philippines.....	*1,580	765,315	271,218	147,906	72,817	20,239
Singapore.....	*60	3,202,925	206,970	104,106	2,609	4,782
Sri Lanka.....	--	24,223	4,361	2,894	*231	--
Thailand.....	*9,526	717,506	203,396	140,605	7,975	8,150
Vietnam.....	*5	5,984	1,716	1,684	--	*160
Other Southern and Southeast Asia.....	--	50,705	9,601	*8,670	*6	*36
Eastern Asia, total.....	*51,356	14,758,243	5,472,268	2,324,750	264,452	175,748
China.....	*51,290	518,298	48,214	35,047	*711	5,280
Hong Kong.....	--	2,289,927	600,986	301,489	6,956	*134,147
Japan.....	*65	9,111,806	4,075,443	1,521,935	190,201	27,681
South Korea.....	--	1,020,824	372,535	177,833	13,043	2,795
Taiwan.....	--	1,160,795	278,350	191,705	53,540	5,845
Other Eastern Asia.....	--	656,594	*96,741	*9,6741	*1	--
Asia not allocable.....	--	313,570	21,987	*21,984	--	*16,802
Oceania, total.....	378,731	5,591,476	1,983,129	696,681	44,956	54,494
Australia.....	*343,625	4,874,581	1,713,621	619,838	37,486	31,699
New Zealand.....	*5	650,948	217,569	26,398	7,239	1,324
Other Oceania.....	*35,101	65,947	51,939	50,445	*231	*21,471
Puerto Rico and U.S. Possessions, total.....	*71	1,912,369	348,522	273,076	4,977	17,510
Puerto Rico.....	*71	1,730,657	272,144	232,372	4,977	10,455
U.S. Possessions, total.....	--	181,712	76,378	40,705	--	*7,055
American Samoa.....	--	3,427	*873	*873	--	--
Guam.....	--	103,540	38,699	20,344	--	--
Virgin Islands.....	--	82,180	25,297	13,773	--	*7,055
Other U.S. Possessions.....	--	-7,435	*11,509	*5,714	--	--
Country not stated.....	2,755,378	17,282,332	1,585,946	1,235,370	115,287	84,172
Foreign Sales Corporation dividends ¹	--	61,988	*90	--	--	--
Interest-Charge Domestic International Sales						
Corporation dividends ¹	--	*1,606	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Selected Country to Which Foreign Tax Was Paid--Continued

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

Selected country	Foreign income and taxes reported on Form 1118--Continued					Taxes deemed paid
	Foreign taxes paid, accrued, and deemed paid--Continued					
	Foreign taxes paid or accrued--Continued					
	Taxes withheld at source on --Continued	Other taxes paid or accrued on--				
		Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	
(19)	(20)	(21)	(22)	(23)	(24)	
All countries.....	2,213,430	4,861,563	8,524	387,240	3,159,976	27,075,476
Canada.....	103,540	249,058	*270	24,938	105,236	3,716,980
Latin America, total.....	369,855	533,144	*51	81,157	414,487	1,933,814
Mexico.....	83,959	214,161	--	8,890	43,816	764,394
Central America, total.....	18,082	27,343	--	2,758	2,739	93,634
Belize.....	*4	*16	--	--	--	*14
Costa Rica.....	6,796	*3,888	--	*252	*1,125	4,925
El Salvador.....	1,680	*2,276	--	*65	*28	*3,065
Guatemala.....	5,444	*7,616	--	1,764	*440	9,065
Honduras.....	1,119	*632	--	*677	*1	*3,537
Nicaragua.....	*35	*356	--	--	*844	*2,945
Panama.....	3,004	*11,273	--	--	*289	70,080
Central America not allocable.....	--	*1,286	--	--	*12	*3
Caribbean countries, total.....	3,480	22,954	--	8,103	5,319	114,350
Cayman Islands (British).....	--	--	--	--	--	76,754
Dominican Republic.....	2,196	*11,910	--	*1,021	*179	*21,561
Haiti.....	*10	*2,088	--	--	*3,030	*802
Jamaica.....	730	6,698	--	*235	*893	*4,178
Trinidad and Tobago.....	*403	*1,801	--	*3,465	*724	*4,922
Other Caribbean countries.....	*142	*457	--	*3,382	*493	6,133
South America, total.....	256,413	268,686	*51	61,405	362,605	961,436
Argentina.....	67,034	118,950	--	40,709	48,000	217,638
Bolivia.....	359	*1,296	--	*133	*1,259	*2,646
Brazil.....	81,399	40,471	*51	6,287	129,329	503,993
Chile.....	41,432	15,329	--	1,297	81,219	36,093
Colombia.....	26,440	50,805	--	1,707	68,464	69,917
Ecuador.....	5,504	*1,032	--	*207	*2,838	4,846
Paraguay.....	*276	*6,357	--	--	*1,907	*21
Peru.....	9,663	6,058	--	4,252	17,191	14,586
Uruguay.....	4,997	*3,746	--	*48	*9	7,218
Venezuela.....	19,295	15,062	--	6,766	12,263	104,477
Other South America.....	*15	*9,578	--	--	*126	--
Latin America not allocable.....	*7,920	--	--	--	*9	--
Other Western Hemisphere, total.....	*647	3,323	*48	*174	*72	172,249
Bahamas.....	--	--	--	--	--	12,187
Bermuda.....	--	--	--	--	--	120,948
Netherlands Antilles.....	--	*1,644	--	--	--	18,099
Other British West Indies.....	*48	*913	*48	*174	*72	19,863
All other Western Hemisphere.....	*600	*766	--	--	--	*1,152
Europe, total.....	443,695	1,630,404	*17	96,308	1,014,784	15,573,927
European Union, total.....	406,542	1,348,037	*17	83,148	879,686	14,699,758
Austria.....	1,982	*7,771	--	--	216	85,553
Belgium.....	*5,190	111,035	--	*690	87,651	314,391
Denmark.....	*98	41,728	--	*1,071	*2,423	96,710
Finland.....	4,723	*608	--	*13	483	38,605
France.....	62,778	46,799	--	4,178	150,678	821,809
Germany.....	3,341	291,005	--	7,567	47,480	2,878,564
Greece.....	1,138	*35,526	--	*477	*78	24,860
Ireland.....	*268	*1,154	--	*2,381	*1,061	175,897
Italy.....	83,361	106,600	*3	*2,502	50,649	1,552,213
Luxembourg.....	--	*58	--	--	--	874,653

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Selected Country to Which Foreign Tax Was Paid--Continued

[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					
	Taxes withheld at source on --Continued	Foreign taxes paid or accrued--Continued				Taxes deemed paid
		Rents, royalties, and license fees	Other taxes paid or accrued on--			
			Branch income	Specifically allocable income [section 863(b)]	Service income	
(19)	(20)	(21)	(22)	(23)	(24)	
Europe--continued						
European Union--continued						
Netherlands.....	130,890	72,690	--	*1,486	5,401	2,331,361
Portugal.....	8,251	*4,882	--	*99	1,451	55,281
Spain.....	83,511	21,420	*1	*1,689	5,805	431,233
Sweden.....	*19	18,415	--	*969	45,931	409,481
United Kingdom.....	20,990	588,346	*13	60,027	480,378	4,609,145
Other European Economic Community.....	--	--	--	--	--	--
Other West European countries, total.....	15,247	263,191	--	3,181	7,607	774,312
Liechtenstein.....	--	*977	--	--	--	*301
Monaco.....	--	--	--	*198	--	*10
Norway.....	*4,609	180,943	--	*596	*875	107,435
Switzerland.....	*586	15,322	--	*1,863	336	628,593
Turkey.....	9,503	65,949	--	*525	*4,738	37,500
Other West European countries.....	*549	--	--	--	*1,657	*473
West European countries not allocable.....	--	--	--	--	--	--
East European countries, total.....	21,763	18,098	--	9,979	127,491	99,833
Romania.....	1,603	*2,073	--	*1,129	*10	*364
Former Soviet Union.....	4,213	8,973	--	1,851	124,805	22,183
Other East European countries.....	15,947	7,052	--	6,999	2,676	77,286
Europe not allocable.....	*143	*1,078	--	--	--	*23
Africa, total.....	39,613	282,562	--	29,454	19,606	185,125
North Africa, total.....	4,840	19,197	--	*13,070	*10,839	20,813
Algeria.....	--	--	--	*12,835	--	*10,553
Egypt.....	*4,494	*14,021	--	*182	*10,317	7,226
Libya.....	--	--	--	--	--	--
Morocco.....	296	*4,608	--	*53	*522	*356
Other North Africa.....	*49	*568	--	--	--	*2,677
East Africa, total.....	597	*4,836	--	*353	*5,375	8,672
Ethiopia.....	--	*1,036	--	--	--	--
Kenya.....	*304	*3,731	--	*345	*5,375	*2,496
Tanzania.....	*21	--	--	--	--	--
Uganda.....	--	--	--	--	--	*657
Other East Africa.....	*272	*69	--	*8	--	*5,519
West and Central Africa, total.....	1,359	234,120	--	*1,268	*1,654	78,588
Gabon.....	--	*1,347	--	--	*274	*1,454
Ghana.....	*27	*131	--	--	*(³)	*13,618
Liberia.....	--	--	--	--	--	*2,024
Nigeria.....	*765	*114,667	--	*293	*99	58,794
Zaire.....	--	--	--	*(³)	*730	*126
Other West and Central Africa.....	*567	*117,975	--	*975	*550	*2,573
Southern Africa, total.....	32,818	24,409	--	*14,764	*1,737	77,052
Malawi.....	--	--	--	--	--	*1,269
Zimbabwe.....	*203	*126	--	--	--	9,952
South Africa (including Namibia).....	27,995	23,593	--	*14,764	*1,704	64,082
Zambia.....	*51	*690	--	--	--	*1,123
Other Southern Africa.....	*4,569	--	--	--	*34	*626
Africa not allocable.....	--	--	--	--	--	--

Footnotes at end of table.

Corporate Foreign Tax Credit, 1998

Table 3.--U.S. Corporation Returns with a Foreign Tax Credit: Foreign Income and Tax Reported on Form 1118, by Selected Country to Which Foreign Tax Was Paid--Continued

[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					
	Taxes withheld at source on --Continued	Other taxes paid or accrued on--				Taxes deemed paid
		Rents, royalties, and license fees	Branch income	Specifically allocable income [section 863(b)]	Service income	
(19)	(20)	(21)	(22)	(23)	(24)	
Asia, total	978,891	1,602,748	*654	41,718	671,998	3,778,382
Middle East, total.....	16,526	115,028	*69	3,270	105,603	87,976
Bahrain.....	*(³)	*163	--	--	--	*384
Iran.....	--	--	--	--	--	--
Iraq.....	--	--	--	--	--	--
Israel.....	11,014	*1,338	*69	*369	400	35,664
Kuwait.....	*1,045	*3,550	--	*19	*2,329	*285
Lebanon.....	102	*844	--	*33	*2	*29
Qatar.....	*7	*2,693	--	*4	*1,066	--
Saudi Arabia.....	4,180	88,569	--	*2,707	*24,167	32,254
United Arab Emirates.....	*3	*12,533	--	--	*19,424	*9,436
Other areas of the Arabian Peninsula.....	*100	*2,586	--	--	*56,485	*9,532
Other Middle East.....	*76	*2,752	--	*137	*1,729	*392
Southern and Southeast Asia, total.....	153,316	672,796	*5	22,038	317,625	542,884
Bangladesh.....	--	*2,160	--	*190	--	--
India.....	7,217	87,098	--	4,597	4,459	36,247
Indonesia.....	6,351	430,337	--	6,999	176,954	187,342
Malaysia.....	10,949	3,012	--	1,709	109,860	25,568
Pakistan.....	*568	*23,832	--	*72	*556	*2,330
Philippines.....	7,860	30,173	--	703	16,115	123,311
Singapore.....	47,623	42,596	*5	893	5,597	102,864
Sri Lanka.....	*566	*2,082	--	*15	*(³)	*1,467
Thailand.....	72,018	43,194	--	5,187	4,080	62,791
Vietnam.....	*34	*633	--	*856	*2	*32
Other Southern and Southeast Asia.....	*131	*7,679	--	*817	*1	*931
Eastern Asia, total.....	808,337	814,568	*579	16,269	244,796	3,147,519
China.....	17,945	5,015	*98	3,426	2,573	13,167
Hong Kong.....	5,452	70,278	*40	*262	84,355	299,497
Japan.....	605,416	647,824	*64	4,732	46,017	2,553,508
South Korea.....	113,347	38,717	*378	2,052	7,502	194,702
Taiwan.....	66,178	52,579	--	5,798	7,765	86,645
Other Eastern Asia.....	--	*156	--	--	*96,584	--
Asia not allocable.....	*712	*355	--	*140	*3,975	*3
Oceania, total	77,891	192,801	--	7,700	318,839	1,286,448
Australia.....	67,950	186,294	--	5,081	291,328	1,093,783
New Zealand.....	9,623	4,470	--	*2,613	1,128	191,171
Other Oceania.....	*318	*2,037	--	*5	*26,383	*1,494
Puerto Rico and U.S. Possessions, total	30,879	134,604	*74	13,929	71,102	75,446
Puerto Rico.....	30,280	106,019	--	12,451	68,190	39,772
U.S. Possessions, total.....	*599	28,586	*74	1,479	2,912	*35,674
American Samoa.....	*4	*861	--	*7	--	--
Guam.....	*41	17,429	*74	*498	2,303	*18,355
Virgin Islands.....	*554	*4,630	--	*973	*562	*11,523
Other U.S. Possessions.....	--	*5,666	--	--	*47	*5,796
Country not stated	168,418	232,921	*669	*91,861	542,044	350,575
Foreign Sales Corporation dividends ¹	--	--	--	--	--	*90
Interest-Charge Domestic International Sales Corporation dividends ¹	--	--	--	--	--	--

¹ Data should be used with caution because of the small number of returns on which they are based.

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

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 Less than \$500.

⁴ Included in total deductions, column 12.

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