

# Controlled Foreign Corporations, 2002

by Mike Masters and Catterson Oh

**F**or Tax Year 2002, the 7,500 largest foreign corporations controlled by large U.S. multinational corporations held \$5.8 trillion in assets and reported receipts of \$2.3 trillion. These amounts increased from Tax Year 2000 by 33.6 percent and 5.7 percent, respectively [1]. The 7,500 largest controlled foreign corporations (CFC's) paid \$38.6 billion in income taxes on \$200.7 billion in earnings and profits (less deficit) before income taxes. These amounts represent respective decreases of 10.5 percent and 3.3 percent from Tax Year 2000.

Over 79 percent, or 5,938, of the 7,500 largest CFC's for Tax Year 2002 were concentrated in three major industrial sectors: (1) goods production; (2) services; and (3) finance, insurance, real estate, and rental and leasing. These three industrial sectors accounted for 85.5 percent of assets (\$4,987.3 billion), 68.9 percent of total receipts (\$1,570.6 billion), 67.6 percent of income taxes (\$26.1 billion), and 80.7 percent of earnings and profits (less deficit) before income taxes (\$162.0 billion).

For Tax Year 2002, the 7,500 largest CFC's were incorporated in 104 different countries [2]. Almost 53 percent, or 3,939, of the 7,500 largest CFC's were incorporated in Europe. Slightly more than 91 percent of these European CFC's were located in European Union countries. Latin America and Asia accounted for 15.8 percent and 11.0 percent, respectively, of the 7,500 largest CFC's.

## Controlled Foreign Corporations

Direct foreign investment by U.S. persons may take several forms, including establishing foreign branches, partnerships with foreign entities, and separate corporations. For U.S. income tax purposes, a foreign corporation is "controlled" if U.S. shareholders own more than 50 percent of its outstanding voting stock, or more than 50 percent of the value of all its outstanding stock (directly, indirectly, or constructively) on any day during the foreign corporation's tax year. A "noncontrolled" foreign corporation is any foreign corporation that fails to

meet either of the above requirements for control. For purposes of determining control, a U.S. shareholder is defined as a U.S. person who owns 10 percent or more of the foreign corporation's total combined voting stock [3]. However, for Statistics of Income purposes, a foreign corporation is controlled only if one U.S. corporation satisfies either of the above 50-percent ownership requirements for an uninterrupted period of at least 30 days during the foreign corporation's tax year [4]. For Tax Year 2002, there were 1,079 U.S. corporations that controlled the 7,500 largest CFC's.

In general, the foreign source income of a foreign corporation is not taxable to the U.S. shareholders until repatriated in the form of a dividend. Recognizing that income could be accumulated in a CFC, thus deferring U.S. tax on the income indefinitely, Congress enacted the Subpart F provisions of the Internal Revenue Code in 1962. These provisions require certain items of income to be treated as dividends deemed paid to the U.S. shareholders and, therefore, subject to U.S. taxation. Currently, a U.S. shareholder of a CFC may be required to include in gross income the shareholder's ratable share of the CFC's: (1) Subpart F income (see Subpart F income in the *Explanation of Selected Terms* section of this article); (2) earnings invested in U.S. property; (3) previously excluded Subpart F income withdrawn from "qualified investments" in less developed countries and in "foreign base company" shipping operations; (4) previously excluded export trade income withdrawn from investment in export trade assets; and (5) factoring income (income derived from the acquisition of a trade or service receivable).

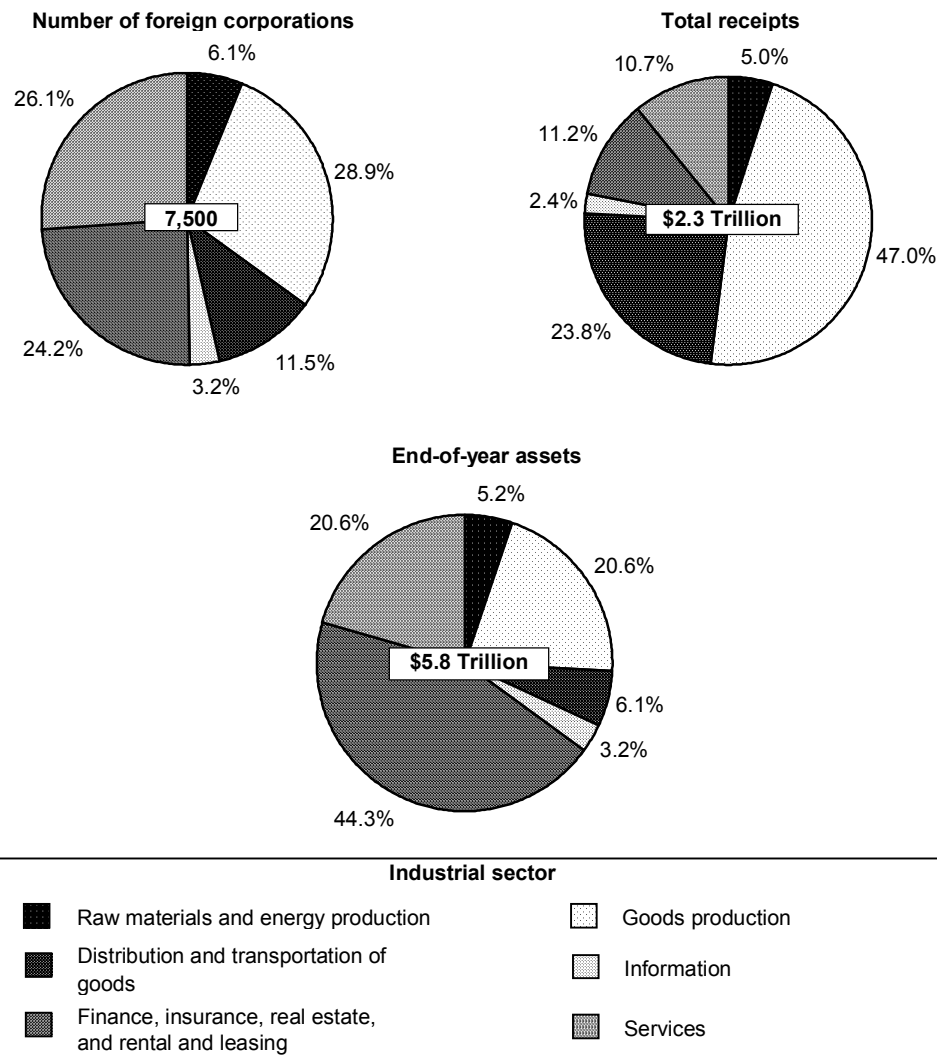
## CFC's by Industrial Sector

For Tax Year 2002, CFC's engaged in finance, insurance, real estate, and rental and leasing accounted for 44.3 percent of end-of-year assets, 11.2 percent of total receipts, and 19.7 percent of current earnings and profits (less deficit) before income taxes reported by the 7,500 largest CFC's (Figure A and Table 1). Slightly more than 58.2 percent of the total receipts and 53.4 percent of earnings and profits (less deficit) before income taxes for this industrial grouping were accounted for by two subsectors: security, commodity contracts, and other financial investments and related products; and insurance carriers and

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**Figure A**

**U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, and Receipts, by North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation, Tax Year 2002**



NOTE: Detail may not add to 100 percent because of rounding.

related activities. Goods producers accounted for 20.6 percent of end-of-year assets, 47.0 percent of total receipts, and 40.0 percent of earnings and profits (less deficit) before income taxes of the 7,500 largest CFC's. Chemical, computer and electronic products, and transportation equipment manufactur-

ers collectively reported 58.5 percent of end-of-year assets, 60.9 percent of total receipts, and 64.0 percent of earnings and profits (less deficits) before income taxes for all goods producers. The information sector had \$4.1 billion in losses in current-year earnings and profits (less deficit) before income

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taxes. This loss was driven by the broadcasting and telecommunications subsector. The information sector was the only sector to report an aggregate deficit in earnings and profits (less deficits) before income taxes.

The two major industrial sectors experiencing the largest growth between Tax Years 2000 and 2002 were distribution and transportation of goods and finance, insurance, real estate, and rental and leasing (Figure B). For Tax Year 2002, CFC's engaged in distribution and transportation of goods reported \$355.6 billion in end-of-year assets, \$542.1 billion in total receipts, and \$24.0 billion in current earnings and profits (less deficit) before income taxes. These amounts increased from Tax Year 2000 by 35.2 percent, 14.0 percent, and 41.7 percent, respectively. Three subsectors were largely responsible for this growth. End-of-year assets grew by 105.4 percent for drugs and druggists' sundries wholesalers, 117.9 percent for petroleum and petroleum products wholesalers, and 67.0 percent for motor vehicles dealers and parts dealers. Total receipts for these subsectors grew by 83.3 percent, 58.9 percent, and 105.8 percent, respectively. CFC's in the finance, insurance, real estate, and rental and leasing sector reported \$2,586.5 billion in end-of-year assets and \$254.4 billion in total receipts for Tax Year 2002. These amounts increased from Tax Year 2000 by 41.7

percent and 19.5 percent, respectively.

All the major industrial sectors experienced considerable growth in end-of-year assets and total receipts between Tax Years 2000 and 2002 except the service sector, which had a moderate decrease in total receipts of 20.7 percent. There were changes in the percentage of the 7,500 largest CFC's included in each major industrial sector. The following sectors experienced growth in the number of CFC's between Tax Years 2000 and 2002: raw materials and energy production, finance, insurance, real estate, and rental and leasing, and services. These sectors grew by 5.3 percent, 6.0 percent, and 0.9 percent, respectively. The percentage of the 7,500 largest CFC's engaged in information declined from 4.0 percent to 3.2 percent between Tax Years 2000 and 2002, a decrease of 20.0 percent. The distribution and transportation of goods sector accounted for 12.2 percent of the 7,500 largest CFC's in Tax Year 2000 and 11.5 percent in Tax Year 2002.

### Geographic Distribution of CFC's

The geographic distribution of the 7,500 largest CFC's by major region was virtually unchanged from Tax Year 2000 to Tax Year 2002. For Tax Year 2002, Europe remained the dominant region for CFC activity. Europe alone accounted for 61.9 percent of end-of-year assets, 55.7 percent of total receipts, and

**Figure B**

### U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number and Receipts by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation, Tax Years 1998, 2000, and 2002

[Money amounts are in thousands of dollars]

| Selected industrial sector of 7,500 largest Controlled Foreign Corporations | Number of foreign corporations |              |              | Total receipts       |                      |                      |
|-----------------------------------------------------------------------------|--------------------------------|--------------|--------------|----------------------|----------------------|----------------------|
|                                                                             | 1998                           | 2000         | 2002         | 1998                 | 2000                 | 2002                 |
|                                                                             | (1)                            | (2)          | (3)          | (4)                  | (5)                  | (6)                  |
| <b>All industries</b> <sup>1</sup> .....                                    | <b>7,500</b>                   | <b>7,500</b> | <b>7,500</b> | <b>1,749,516,820</b> | <b>2,157,736,289</b> | <b>2,280,609,940</b> |
| Raw materials and energy production.....                                    | 405                            | 435          | 458          | 71,311,519           | 109,464,006          | 113,151,370          |
| Goods production.....                                                       | 2,477                          | 2,197        | 2,165        | 923,232,646          | 1,002,032,315        | 1,071,845,768        |
| Distribution and transportation of goods.....                               | 1,001                          | 915          | 864          | 355,151,932          | 475,399,981          | 542,127,900          |
| Information.....                                                            | 216                            | 298          | 240          | 32,507,167           | 49,818,018           | 54,766,307           |
| Finance, insurance, real estate, and rental and leasing.....                | 1,612                          | 1,713        | 1,816        | 185,490,963          | 212,915,499          | 254,388,811          |
| Services.....                                                               | 1,770                          | 1,939        | 1,957        | 180,629,840          | 307,993,046          | 244,329,784          |

<sup>1</sup> Includes "Nature of business not allocable," not shown separately.

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57.6 percent of earnings and profits (less deficit) before income taxes for the 7,500 largest CFC's (Figure C and Tables 2 and 3). These percentages increased only slightly from Tax Year 2000. The two geographic groupings with the smallest representation in the 7,500 largest CFC's were Africa and U.S. Possessions (including Puerto Rico). These two regions collectively accounted for less than 1.0 percent of end-of-year assets and slightly more than 1.0 percent of total receipts and earnings and profits (less deficits) before income taxes of all goods producers.

One region experienced significant growth, while two regions experienced moderate growth between Tax Years 2000 and 2002. For Tax Year 2002, CFC's based in other Western Hemisphere countries reported \$428.6 billion in end-of-year assets, \$132.9 billion in total receipts, and \$16.1 billion in earnings and profits (less deficits) before income taxes. These amounts increased from Tax Year 2000 by 93.8 percent, 71.2 percent, and 28.5 percent, respectively. African CFC's reported \$18.1 billion in end-of-year assets, \$13.6 billion in total receipts, and \$1.3 billion in earnings and profits (less deficits) before income taxes. These totals represent increases from Tax Year 2000 of 13.5 percent, 29.5 percent, and 97.8 percent, respectively. CFC's based in Oceania reported \$155.3 billion in end-of-year assets, \$51.6 billion in total receipts, and \$4.7 billion in earnings and profits (less deficits) before income taxes. These totals represent increases from Tax Year 2000 of 36.8 percent, 6.2 percent, and 50.1 percent, respectively.

Figure D, which shows the number of CFC's and total receipts for selected countries for the 7,500 largest CFC's for Tax Years 1996, 1998, 2000, and 2002, indicates that several individual countries experienced large growth in total receipts between Tax Years 1996 and 2002. Luxembourg experienced the largest growth in total receipts. CFC's based in Luxembourg went from \$4.1 billion in total receipts for Tax Year 1996 to \$74.8 billion for Tax Year 2002. CFC's in the Netherlands Antilles, Bermuda, Bahamas, and the Cayman Islands (British) also experienced tremendous growth, reporting 1,331.9-percent, 426.0-percent, 326.0-percent, and 173.4-percent increases in total receipts, respectively, between Tax Years 1996 and 2002. Also, CFC's in China, Puerto Rico, Switzerland, and Ireland experi-

enced significant growth, reporting 311.0-percent, 249.5-percent, 182.5-percent, and 173.0-percent increases in total receipts, respectively, between Tax Years 1996 and 2002.

### Profitability

For purposes of this article, two measures are used to assess pretax profitability for the 7,500 largest CFC's: rate of return on assets and profit margin. Rate of return on assets is defined as current earnings and profits (less deficit) before income taxes divided by end-of-year assets. Profit margin is defined as current earnings and profits (less deficit) before income taxes divided by total receipts.

Both measures of profitability increased from Tax Year 1992 to Tax Year 1996, decreased from Tax Year 1996 to Tax Year 1998, increased again from Tax Year 1998 to Tax Year 2000, and decreased from Tax Year 2000 to Tax Year 2002. Between Tax Year 1992 and Tax Year 1996, the aggregate rate of return on assets increased from 4.4 percent to 5.1 percent. The rate of return on assets fell to 4.5 percent for Tax Year 1998, rose to 4.8 percent for Tax Year 2000, and fell again for Tax Year 2002 to 3.4 percent. Profit margins increased from 5.7 percent for Tax Year 1992 to 8.4 percent for Tax Year 1996 before decreasing to 8.2 percent for Tax Year 1998. Profit margins then increased to a decade high of 9.6 percent for Tax Year 2000, but fell for Tax Year 2002 to 8.8 percent.

For Tax Year 2002, profitability measures varied among the six different major industrial sectors. Of the 7,500 largest CFC's, those engaged in raw materials and energy production reported a 6.2-percent rate of return on assets and a 16.6-percent profit margin. These rates decreased from the 10.3-percent rate of return on assets and the 23.4-percent profit margin reported by CFC's for Tax Year 2000. CFC's involved in the service industry reported a 3.5-percent rate of return on assets and a 17.3-percent profit margin for Tax Year 2002. For Tax Year 2000, these CFC's reported a 5.1-percent rate of return on assets and a 15.3-percent profit margin.

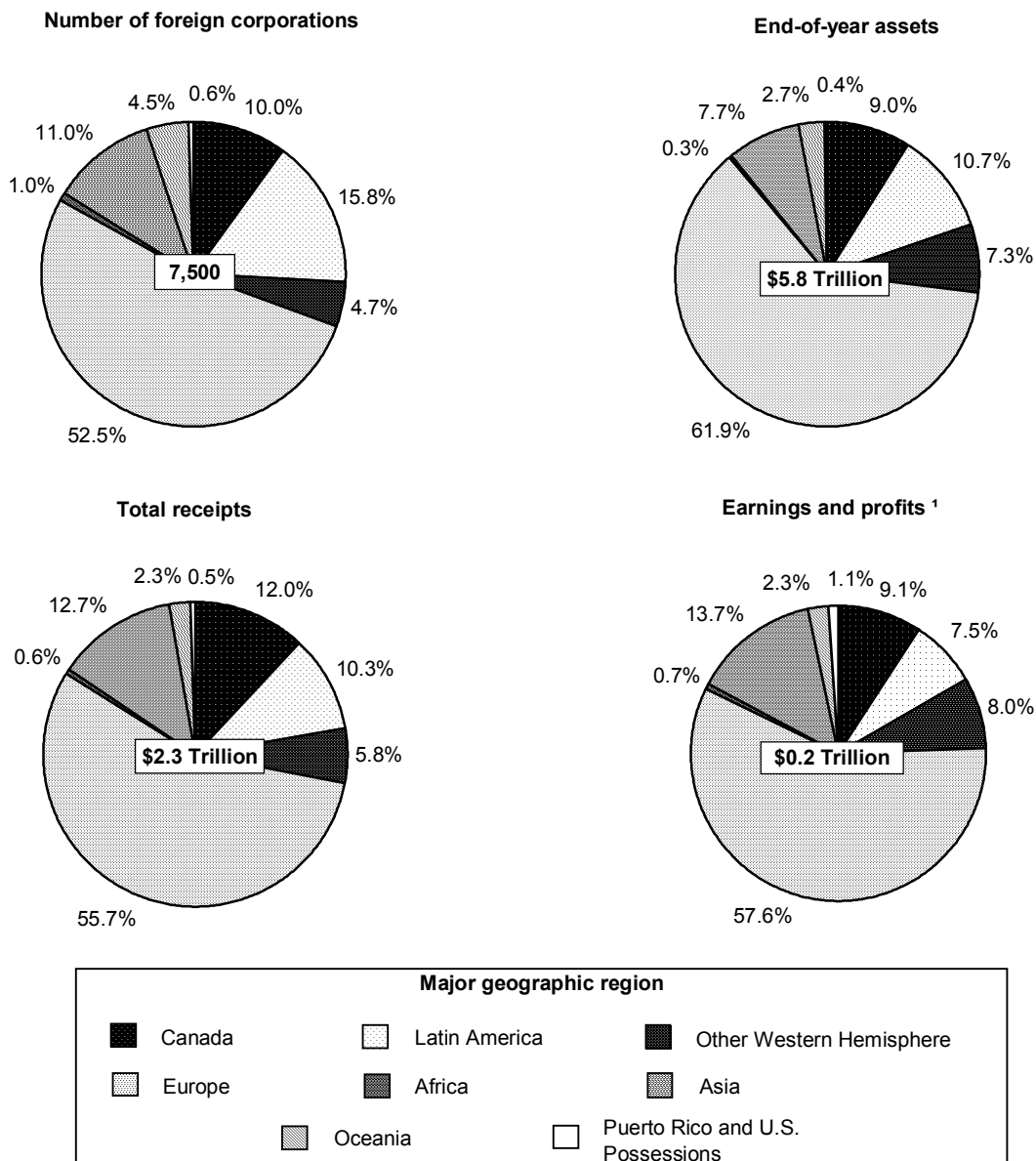
### Distributions of Earnings and Profits

The 7,500 largest CFC's distributed \$97.0 billion of earnings and profits to U.S. and foreign shareholders for Tax Year 2002, about 2.2 percent more than was

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**Figure C**

**U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, and Earnings and Profits, by Major Geographic Region of Incorporation of Controlled Foreign Corporation, Tax Year 2002**



<sup>1</sup> Less deficits and before income taxes.

NOTE: Detail may not add to 100 percent because of rounding.

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**Figure D**

## U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number and Receipts by Selected Country of Incorporation of Controlled Foreign Corporation, Tax Years 1996, 1998, 2000, and 2002

[Money amounts are in millions of dollars]

| Selected country of incorporation of 7,500 largest<br>Controlled Foreign Corporations | Number of foreign corporations |       |       |       | Total receipts |         |         |         |
|---------------------------------------------------------------------------------------|--------------------------------|-------|-------|-------|----------------|---------|---------|---------|
|                                                                                       | 1996                           | 1998  | 2000  | 2002  | 1996           | 1998    | 2000    | 2002    |
|                                                                                       | (1)                            | (2)   | (3)   | (4)   | (5)            | (6)     | (7)     | (8)     |
| Argentina.....                                                                        | 122                            | 133   | 148   | 116   | 16,199         | 19,911  | 20,655  | 11,939  |
| Australia.....                                                                        | 332                            | 294   | 273   | 286   | 47,187         | 44,912  | 43,735  | 45,502  |
| Austria.....                                                                          | 37                             | 37    | 26    | 31    | 9,346          | 8,308   | 9,237   | 9,709   |
| Bahamas.....                                                                          | 40                             | 55    | 63    | 59    | 4,274          | 5,040   | 14,437  | 18,205  |
| Belgium.....                                                                          | 206                            | 171   | 141   | 124   | 33,721         | 29,869  | 28,826  | 28,916  |
| Bermuda.....                                                                          | 163                            | 164   | 181   | 214   | 16,949         | 18,554  | 44,997  | 89,154  |
| Brazil.....                                                                           | 241                            | 260   | 252   | 199   | 54,114         | 63,246  | 57,718  | 52,843  |
| Canada.....                                                                           | 685                            | 682   | 708   | 748   | 195,744        | 209,536 | 279,854 | 274,041 |
| Cayman Islands (British).....                                                         | 128                            | 216   | 283   | 320   | 15,505         | 25,315  | 39,443  | 42,394  |
| Chile.....                                                                            | 69                             | 69    | 70    | 64    | 5,262          | 5,628   | 5,733   | 5,293   |
| China.....                                                                            | 55                             | 62    | 60    | 71    | 5,259          | 7,595   | 14,046  | 21,614  |
| Colombia.....                                                                         | 31                             | 30    | 30    | 20    | 4,222          | 4,081   | 3,359   | 3,307   |
| Czech Republic.....                                                                   | 14                             | 20    | 19    | 22    | 1,824          | 1,249   | 1,874   | 2,880   |
| Denmark.....                                                                          | 38                             | 39    | 48    | 51    | 4,603          | 4,355   | 5,547   | 4,540   |
| Finland.....                                                                          | 22                             | 18    | 20    | 13    | 2,649          | 3,029   | 3,850   | 2,200   |
| France (including Andorra and Corsica).....                                           | 521                            | 479   | 410   | 370   | 108,632        | 100,922 | 91,435  | 92,604  |
| Germany.....                                                                          | 535                            | 516   | 431   | 438   | 184,869        | 172,700 | 144,302 | 137,682 |
| Greece.....                                                                           | 22                             | 14    | 6     | 9     | 2,638          | 1,411   | 705     | 929     |
| Hong Kong.....                                                                        | 155                            | 127   | 111   | 107   | 34,920         | 28,162  | 31,533  | 28,928  |
| India.....                                                                            | 27                             | 30    | 32    | 34    | 2,159          | 1,998   | 3,382   | 3,406   |
| Indonesia.....                                                                        | 24                             | 11    | 8     | 13    | 1,268          | 462     | 965     | 2,968   |
| Ireland.....                                                                          | 135                            | 157   | 176   | 197   | 19,338         | 30,729  | 49,368  | 52,802  |
| Israel (and the West Bank).....                                                       | 15                             | 22    | 33    | 29    | 2,699          | 3,776   | 7,021   | 5,026   |
| Italy (including San Marino).....                                                     | 295                            | 242   | 197   | 201   | 61,410         | 58,879  | 46,973  | 44,050  |
| Japan (including Okinawa and Ryukyu Islands).....                                     | 266                            | 236   | 248   | 225   | 103,660        | 100,278 | 157,629 | 117,084 |
| Liberia.....                                                                          | 22                             | 18    | 16    | 12    | 3,615          | 3,561   | 2,194   | 2,091   |
| Luxembourg.....                                                                       | 34                             | 51    | 73    | 118   | 4,051          | 7,314   | 19,018  | 74,762  |
| Malaysia.....                                                                         | 56                             | 45    | 40    | 39    | 12,250         | 9,709   | 10,369  | 13,573  |
| Mexico.....                                                                           | 201                            | 244   | 271   | 293   | 41,564         | 51,502  | 85,409  | 102,335 |
| Netherland Antilles.....                                                              | 46                             | 26    | 27    | 28    | 909            | 901     | 931     | 13,016  |
| Netherlands.....                                                                      | 462                            | 523   | 554   | 559   | 117,047        | 168,177 | 219,551 | 249,977 |
| New Zealand.....                                                                      | 61                             | 40    | 38    | 42    | 6,074          | 4,782   | 3,869   | 5,826   |
| Nigeria.....                                                                          | 9                              | 8     | 9     | 8     | 1,998          | 1,289   | 875     | 897     |
| Norway.....                                                                           | 36                             | 45    | 30    | 35    | 8,045          | 9,077   | 12,376  | 5,942   |
| Panama (including Canal Zone).....                                                    | 40                             | 34    | 37    | 31    | 5,554          | 4,023   | 3,514   | 2,874   |
| Peru.....                                                                             | 14                             | 20    | 19    | 17    | 1,444          | 2,082   | 1,499   | 1,105   |
| Philippines.....                                                                      | 30                             | 32    | 35    | 36    | 3,364          | 3,598   | 5,151   | 7,032   |
| Poland.....                                                                           | 20                             | 32    | 33    | 28    | 2,565          | 4,669   | 4,271   | 5,596   |
| Portugal.....                                                                         | 47                             | 39    | 29    | 29    | 5,436          | 5,476   | 4,982   | 7,314   |
| Puerto Rico.....                                                                      | 31                             | 37    | 42    | 37    | 3,104          | 5,276   | 8,910   | 10,846  |
| Russia.....                                                                           | **                             | 17    | 10    | 11    | **             | 1,321   | 1,560   | 2,621   |
| Singapore.....                                                                        | 114                            | 111   | 109   | 112   | 39,656         | 43,336  | 54,784  | 41,922  |
| South Africa (including Namibia).....                                                 | 27                             | 32    | 24    | 21    | 3,472          | 4,278   | 4,424   | 5,106   |
| South Korea, Republic of.....                                                         | 52                             | 41    | 62    | 66    | 10,795         | 5,644   | 14,948  | 23,943  |
| Spain.....                                                                            | 203                            | 177   | 151   | 175   | 38,921         | 38,256  | 36,404  | 63,089  |
| Sweden.....                                                                           | 81                             | 72    | 83    | 86    | 14,414         | 15,701  | 28,823  | 26,836  |
| Switzerland.....                                                                      | 157                            | 147   | 173   | 185   | 39,974         | 49,535  | 80,221  | 112,939 |
| Taiwan.....                                                                           | 48                             | 41    | 43    | 42    | 11,712         | 11,880  | 15,049  | 14,162  |
| Thailand.....                                                                         | 51                             | 40    | 37    | 40    | 8,944          | 4,550   | 8,026   | 10,088  |
| Turkey.....                                                                           | 27                             | 26    | 18    | 17    | 5,783          | 6,712   | 5,208   | 3,962   |
| United Kingdom.....                                                                   | 1,200                          | 1,255 | 1,291 | 1,189 | 310,606        | 301,366 | 372,709 | 334,600 |
| Uruguay.....                                                                          | 17                             | 12    | 11    | 11    | 456            | 363     | 599     | 198     |
| Venezuela.....                                                                        | 43                             | 47    | 52    | 41    | 5,214          | 8,951   | 11,360  | 6,969   |

\*\*Not shown to avoid disclosure of information on specific corporations.



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distributed for Tax Year 2000. Slightly more than 60 percent of distributions of earnings and profits were not previously taxed earnings and profits (\$58.6 billion), while the remainder was distributed from previously taxed earnings and profits (\$38.5 billion).

The majority of distributions of earnings and profits are attributed to CFC's doing business in the goods production and services sectors. These two industrial sectors distributed \$60.7 billion of earnings and profits, or 62.6 percent of total distributions. Of this total, \$37.7 billion were from not previously taxed earnings and profits, with the remaining \$23.0 billion coming from previously taxed earnings and profits. Two industrial sectors had significant increases in distributions of earnings and profits from Tax Year 2000 to Tax Year 2002. CFC's engaged in the distribution and transportation of goods and the services sectors reported increases of 36.7 percent and 16.4 percent, respectively.

European based CFC's accounted for 56.4 percent (\$54.7 billion) of all distributions of earnings and profits. Almost 58 percent of these distributions were from not previously taxed earnings and profits (\$31.6 billion), with the remainder distributed from previously taxed earnings and profits (\$23.1 billion). Asian CFC's distributed \$14.6 billion of earnings and profits in Tax Year 2002. This represents an increase of 15.3 percent from Tax Year 2000. Foreign entities incorporated in OPEC countries distributed

\$1.2 billion of earnings and profits in Tax Year 2002, an 88.5-percent increase from Tax Year 2000.

From Tax Year 2000 to Tax Year 2002, four of the six major industrial sectors saw a decline in the taxable payout ratio, defined as taxable dividends paid to a U.S. person by a CFC with positive current earnings and profits net of current-year Subpart F income divided by positive current earnings and profits net of current-year Subpart F income (Figure E) (see definitions of U.S. person, Current earnings and profits, and Subpart F Income in the *Explanation of Selected Terms*). For the 7,500 largest CFC's, the taxable dividend payout ratio declined from 23.6 percent to 13.6 percent (a 42.4-percent decline) and from 10.2 percent to 8.7 percent (a 15.3-percent decline) for the raw materials and energy production and goods production sectors, respectively. From Tax Year 2000 to Tax Year 2002, foreign corporations engaged in distributions and transportation of goods and services sectors reported increases in the taxable payout ratio from 8.7 percent to 13.8 percent (a 58.6-percent increase) and from 15.2 percent to 16.3 percent (a 7.2-percent increase), respectively.

### Data Sources and Limitations

The statistics presented in this article are based on information collected from corporate tax returns (Form(s) 1120) with accounting periods ending July 2002 through June 2003 and their attached Form(s)

**Figure E**

**U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number of Foreign Corporations with Positive Current Earnings and Profits Net of Current-Year Subpart F Income and Taxable Payout Ratios, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation, Tax Years 1998, 2000, and 2002**

| Selected industrial sector of 7,500 largest Controlled Foreign Corporations | Number of foreign corporations with positive current earnings and profits net of current-year Subpart F income |              |              | Taxable payout ratio (percentage) |             |             |
|-----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|--------------|--------------|-----------------------------------|-------------|-------------|
|                                                                             | 1998                                                                                                           | 2000         | 2002         | 1998                              | 2000        | 2002        |
|                                                                             | (1)                                                                                                            | (2)          | (3)          | (4)                               | (5)         | (6)         |
| <b>All industries</b> <sup>1</sup> .....                                    | <b>4,558</b>                                                                                                   | <b>4,559</b> | <b>4,405</b> | <b>16.0</b>                       | <b>11.9</b> | <b>10.3</b> |
| Raw materials and energy production.....                                    | 221                                                                                                            | 305          | 284          | 21.9                              | 23.6        | 13.6        |
| Goods production.....                                                       | 1,747                                                                                                          | 1,578        | 1,482        | 12.9                              | 10.2        | 8.7         |
| Distribution and transportation of goods.....                               | 610                                                                                                            | 567          | 582          | 19.8                              | 8.7         | 13.8        |
| Information.....                                                            | 117                                                                                                            | 117          | 124          | 4.5                               | 10.1        | 9.1         |
| Finance, insurance, real estate, and rental and leasing .....               | 872                                                                                                            | 996          | 999          | 6.3                               | 5.2         | 4.1         |
| Services.....                                                               | 982                                                                                                            | 994          | 934          | 25.2                              | 15.2        | 16.3        |

<sup>1</sup> Includes "Nature of business not allocable," not shown separately.

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5471, *Information Return of U.S. Persons With Respect to Certain Foreign Corporations*. A U.S. corporation is required by Internal Revenue Service regulations to submit a Form 5471 for any Controlled Foreign Corporation (CFC) with an accounting period ending with or within the U.S. parent's accounting period. Thus, the accounting periods for Tax Year 2002 CFC's may have ended as early as July 2001 and as late as June 2003. However, most CFC activity occurred in Calendar Year 2002.

These statistics report data for the 7,500 largest (in terms of total assets) active foreign corporations controlled by U.S. corporations with total assets of \$500 million or more (see definitions of Total assets and Active versus inactive Controlled Foreign Corporations in the *Explanation of Selected Terms*). The 7,500 largest CFC's accounted for 92.5 percent of total end-of-year assets, 81.7 percent of total receipts, and 89.9 percent of current earnings and profits (less deficit) before income taxes reported by all active CFC's of these U.S. corporations with assets of \$500 million or more [5]. The amount of total assets for these 7,500 largest CFC's ranged from approximately \$79.5 million to \$323.0 billion [6].

Since the 1,079 parent corporations with assets of \$500 million or more and CFC's included in the 7,500 largest controlled foreign corporations were selected at a 100-percent rate for the Statistics of Income sample of all corporation income tax returns, the data are not subject to sampling variability, although they may be subject to nonsampling error.

Several limitations apply when making comparisons to prior-year statistics for the 7,500 largest CFC's. First, the composition of the 7,500 largest CFC's is not consistent across tax years. For example, only 68.7 percent of the 7,500 largest CFC's for Tax Year 2002 were also included in the 7,500 largest CFC's for Tax Year 2000. Many of the 7,500 largest CFC's for Tax Year 2000 that were not included among the 7,500 largest CFC's for Tax Year 2002 were still controlled by U.S. corporations, but the size of their total assets for Tax Year 2002 excluded them from this group. In addition, some of the 7,500 largest CFC's for Tax Year 2000 were not included in Tax Year 2002 because they were no longer "controlled" or the U.S. parent corporation's total assets had fallen below \$500 million.

Second, statistics previously published by Statistics of Income for tax years before 1986 were for all

CFC's controlled by U.S. corporations with total assets of \$250 million or more, not just the 7,500 largest active CFC's controlled by U.S. corporations with total assets of \$500 million or more. Therefore, the statistics for these years include smaller and also inactive CFC's. For this reason, comparisons between statistics on the largest CFC's and statistics for years before 1986 should be made with caution.

Caution should also be used when comparing data by industrial groupings. For Tax Years 1998, 2000, and 2002, CFC's were classified under the North American Industry Classification System (NAICS), which differs from the Standard Industrial Classification (SIC) system used before Tax Year 1998. While most industries were not affected by the implementation of NAICS, the groupings of some economic activities were changed. The most significant change was the movement of the management of companies and enterprises sector from finance, insurance, and real estate under the SIC system to the services sector under NAICS.

It should also be noted that the industrial mix of the 7,500 largest CFC's is not representative of the industrial mix of all active foreign corporations controlled by U.S. corporations reporting \$500 million or more in assets. This is exemplified by the CFC's engaged in the distribution and transportation of goods. Slightly more than 11.5 percent of the 7,500 largest CFC's for Tax Year 2002 are classified in the distribution and transportation of goods, while 20.4 percent of all active CFC's of U.S. corporations reporting \$500 million or more in total assets are classified in the same sector [7]. Conversely, 24.2 percent of the 7,500 largest CFC's for Tax Year 2002 were engaged in the finance, insurance, real estate, and rental and leasing sector, while only 14.3 percent of all active CFC's of U.S. corporations reporting \$500 million or more were classified in this sector [8]. Furthermore, CFC's were classified by industry based on their principal business activity as reported on Form 5471. However, assets, receipts, and profits may have also been related to secondary business activities. It is not possible to measure the extent of these secondary business activities due to these activities not being detailed on Form 5471.

### Explanation of Selected Terms

*Active versus inactive Controlled Foreign Corporations.*--In general, a foreign corporation



## Controlled Foreign Corporations, 2002

was considered “active” if earnings and profits, income taxes, receipts, expenses, or certain transactions between the foreign corporation and its subsidiaries or majority shareholder were reported on Form 5471, *Information Return of U.S. Persons with Respect to Certain Foreign Corporations*. The filing of Form 5471 was required even if a CFC was dormant or inactive for Tax Year 2002. All CFC’s included in the 7,500 largest grouping were active for Tax Year 2002.

*Controlled Foreign Corporation.*--Section 957 of the Internal Revenue Code defines a foreign corporation as being “controlled” if more than 50 percent of the total combined voting power of all classes of stock of such corporation entitled to vote, or more than 50 percent of the value of all its outstanding stock, is owned (directly, indirectly, or constructively) by U.S. shareholders on any day during the foreign corporation’s tax year. A U.S. shareholder for purposes of determining control is defined as a “U.S. person” (see definition below) owning 10 percent or more of the foreign corporation’s voting stock. For purposes of these statistics, a foreign corporation was “controlled” only if a single U.S. corporation satisfied the ownership requirements for an uninterrupted period of at least 30 days. U.S. corporations may also control a CFC through a partnership where the U.S. corporation is the controlling partner. To the extent possible, these CFC’s have also been included in these statistics.

*Country of incorporation.*--The country of incorporation is the country under whose laws the CFC is legally created. The CFC’s country of incorporation is not necessarily the principal place of business. Some 273 (3.6 percent) of the 7,500 largest CFC’s for Tax Year 2002 reported a principal place of business that differed from the reported country of incorporation. Tables 2 and 3 provide data by country of incorporation; data by principal place of business are not included in these statistics.

*Current earnings and profits.*--Current earnings and profits represent the difference between total earnings and profits of the foreign corporation at the end of the current year (before reduction by dividends paid during the year) and the accumulated earnings and profits of the corporation at the beginning of the year. Although current earnings and profits typically are an after-tax measure of profits,

they are shown in these statistics both before and after taxes. “Earnings and profits” is a tax concept referring to the economic capacity of a corporation to make a distribution to shareholders that is not a return on capital. The concept is similar to the notion of retained earnings. The term “earnings and profits” is not specifically defined in the Internal Revenue Code. In those instances where current earnings and profits were not reported for the foreign corporation, net income per books was used in place of missing earnings and profits.

*Distributions out of earnings and profits.*--A distribution comes first from current earnings and profits and then from accumulated earnings and profits.

*Income taxes.*--CFC’s reported income, war profits, and excess profits taxes paid or accrued to any foreign country or U.S. Possession as income tax for their annual accounting periods.

*OPEC countries.*--The member countries of the Organization of Petroleum Exporting Countries for Tax Year 2002 were: Algeria, Indonesia, Iran, Iraq, Kuwait, Libya, Nigeria, Qatar, Saudi Arabia, United Arab Emirates, and Venezuela.

*Previously taxed earnings and profits.*--This includes any earnings and profit amounts that were subject to U.S. tax in the current year or in a prior year, but not distributed. Previously taxed earnings and profits include amounts related to Subpart F income (see definition below), earnings related to investments in certain U.S. property, previously excluded Subpart F income withdrawn from qualified investments, previously excluded export trade income withdrawn from investment in export trade assets, factoring income, and earnings invested in excess passive assets.

*Subpart F income.*--Internal Revenue Code sections 951 and 952 stipulate specific cases in which earnings and profits are deemed to have been paid by a CFC to a U.S. shareholder. Such income is subject to U.S. tax whether or not it is repatriated to U.S. shareholders in the form of an actual dividend. Internal Revenue Code section 951 requires that U.S. shareholders include in their gross incomes certain undistributed profits of foreign corporations controlled by U.S. shareholders. Subpart F income from a CFC includes certain insurance income of U.S. risks, “foreign base company” income, international boycott participation income, bribes and other illegal pay-

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ments to foreign government officials, and income from any country which the United States does not recognize or with which it has severed relations, or which repeatedly provides support for acts of international terrorism.

*Total assets.*--For purposes of determining the 7,500 largest CFC's for these statistics, total assets are defined as the larger of the foreign corporation's beginning-of-year and end-of-year total assets.

*Total receipts.*--Total receipts equal business receipts (gross receipts from sales and operations) plus income from investment activity. In the statistics reported prior to 1990, "business receipts" were used to describe the larger of "gross receipts from sales and operations" and "total income." The latter is a tax return concept used to describe the sum of business receipts less cost of sales and operations (i.e., gross profit), plus income (less loss) from investments.

*U.S. person.*--A U.S. person can be a U.S. citizen or resident, a domestic partnership, a domestic corporation, or an estate or trust (other than a foreign estate or trust whose income from sources outside the United States is not includable in the beneficiaries' gross incomes).

### Notes and References

[1] Statistics of Income studies of Controlled Foreign Corporations are conducted for even-numbered tax years. For Tax Year 2000 data, see Mahony, Lee and Wenrich, Jason, "Con-

trolled Foreign Corporations, 2000," *Statistics of Income Bulletin*, Summer 2004, Volume 24, Number 1.

- [2] Based on unpublished data.
- [3] The current definition of a Controlled Foreign Corporation is provided in Internal Revenue Code section 957. Ownership attribution rules are provided in section 958.
- [4] Generally, complete Form 5471 filings are required only for foreign corporations controlled by a single U.S. shareholder. Partial filing requirements exist for foreign corporations which are not controlled by a single U.S. shareholder. For more details, refer to the instructions for Form 5471.
- [5] Based on unpublished data. For Tax Year 2002, there were 2,130 U.S. corporate returns with \$500 million or more in total assets that filed Forms 5471. These 2,130 corporations controlled 51,726 active foreign corporations which reported \$6,306.3 billion in total end-of-year assets, \$2,792.1 billion in total receipts, and \$223.2 billion in total current earnings and profits (less deficit) before income taxes.
- [6] Based on unpublished data.
- [7] Based on unpublished data.
- [8] Based on unpublished data.

# Controlled Foreign Corporations, 2002

**Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation**

[Money amounts are in thousands of dollars]

| Selected industrial sector of 7,500 largest Controlled Foreign Corporations | Number of U.S. corporation returns <sup>1</sup> | 7,500 largest Controlled Foreign Corporations |                      |                      |                      |
|-----------------------------------------------------------------------------|-------------------------------------------------|-----------------------------------------------|----------------------|----------------------|----------------------|
|                                                                             |                                                 | Number of foreign corporations                | Total assets         |                      | Total receipts       |
|                                                                             |                                                 |                                               | Beginning of year    | End of year          |                      |
|                                                                             | (1)                                             | (2)                                           | (3)                  | (4)                  | (5)                  |
| <b>All industries.....</b>                                                  | <b>1,079</b>                                    | <b>7,500</b>                                  | <b>4,949,650,029</b> | <b>5,834,059,131</b> | <b>2,280,609,940</b> |
| <b>Raw materials and energy production.....</b>                             | <b>115</b>                                      | <b>458</b>                                    | <b>287,756,355</b>   | <b>303,293,883</b>   | <b>113,151,370</b>   |
| Agriculture, forestry, and fishing .....                                    | 13                                              | 27                                            | 6,588,885            | 13,844,164           | 8,552,367            |
| Mining.....                                                                 | 72                                              | 286                                           | 184,846,683          | 199,459,554          | 60,167,095           |
| Oil and gas extraction.....                                                 | 46                                              | 209                                           | 160,916,249          | 173,917,127          | 51,507,811           |
| Metal ore mining.....                                                       | 7                                               | 34                                            | 14,715,415           | 15,573,720           | 4,084,466            |
| Other mining.....                                                           | 27                                              | 43                                            | 9,215,020            | 9,968,707            | 4,574,818            |
| Utilities.....                                                              | 38                                              | 145                                           | 96,320,787           | 89,990,165           | 44,431,908           |
| <b>Goods production.....</b>                                                | <b>491</b>                                      | <b>2,165</b>                                  | <b>1,030,177,179</b> | <b>1,200,329,734</b> | <b>1,071,845,768</b> |
| Construction .....                                                          | 12                                              | 38                                            | 6,635,345            | 8,253,957            | 10,190,352           |
| Construction of buildings, heavy construction, and civil engineering.....   | 6                                               | 8                                             | 1,573,106            | 1,732,188            | 2,202,947            |
| Specialty trade contractors.....                                            | 7                                               | 30                                            | 5,062,239            | 6,521,769            | 7,987,404            |
| Manufacturing .....                                                         | 484                                             | 2,127                                         | 1,023,541,834        | 1,192,075,777        | 1,061,655,417        |
| Food manufacturing.....                                                     | 31                                              | 181                                           | 58,598,281           | 79,678,407           | 65,505,564           |
| Beverage and tobacco product manufacturing.....                             | 13                                              | 82                                            | 45,997,235           | 54,299,092           | 57,140,462           |
| Textile mills and textile product mills.....                                | 8                                               | 9                                             | 1,255,804            | 1,208,371            | 997,820              |
| Apparel manufacturing.....                                                  | 8                                               | 25                                            | 4,989,445            | 6,056,918            | 6,188,970            |
| Wood product manufacturing.....                                             | 7                                               | 8                                             | 1,810,138            | 2,017,138            | 883,514              |
| Paper manufacturing.....                                                    | 23                                              | 87                                            | 45,211,241           | 47,154,823           | 23,771,375           |
| Petroleum and coal products manufacturing.....                              | 10                                              | 40                                            | 57,482,636           | 77,784,590           | 94,113,877           |
| Chemical manufacturing.....                                                 | 107                                             | 478                                           | 268,228,303          | 333,500,300          | 191,446,209          |
| Pharmaceutical and medicine manufacturing.....                              | 33                                              | 146                                           | 128,862,145          | 185,332,969          | 113,293,460          |
| Other chemical manufacturing.....                                           | 82                                              | 332                                           | 139,366,158          | 148,167,331          | 78,152,750           |
| Plastics and rubber products manufacturing.....                             | 24                                              | 60                                            | 28,666,599           | 42,229,271           | 18,597,671           |
| Nonmetallic mineral product manufacturing.....                              | 14                                              | 53                                            | 23,817,802           | 26,143,774           | 9,397,954            |
| Primary metal manufacturing.....                                            | 16                                              | 37                                            | 14,553,508           | 15,222,139           | 14,220,827           |
| Fabricated metal product manufacturing.....                                 | 34                                              | 82                                            | 13,555,046           | 14,967,722           | 12,536,508           |
| Machinery manufacturing.....                                                | 47                                              | 109                                           | 21,647,996           | 24,436,263           | 21,848,507           |
| Computer and electronic product manufacturing.....                          | 88                                              | 283                                           | 172,164,795          | 172,021,959          | 187,812,174          |
| Electric equipment, appliance, and component manufacturing.....             | 47                                              | 122                                           | 31,279,672           | 33,006,323           | 32,388,532           |
| Transportation equipment manufacturing.....                                 | 51                                              | 263                                           | 173,837,142          | 196,662,493          | 273,405,485          |
| Motor vehicles and parts manufacturing.....                                 | 38                                              | 232                                           | 163,564,157          | 181,822,875          | 265,564,320          |
| Other transportation equipment manufacturing.....                           | 16                                              | 31                                            | 10,272,985           | 14,839,618           | 7,841,165            |
| Furniture and related product manufacturing.....                            | 8                                               | 13                                            | 1,966,585            | 2,014,110            | 1,745,362            |
| Miscellaneous manufacturing.....                                            | 77                                              | 195                                           | 58,479,608           | 63,672,083           | 49,654,606           |
| <b>Distribution and transportation of goods.....</b>                        | <b>275</b>                                      | <b>864</b>                                    | <b>312,073,971</b>   | <b>355,638,840</b>   | <b>542,127,900</b>   |
| Wholesale and retail trade.....                                             | 253                                             | 797                                           | 299,120,029          | 341,198,321          | 534,570,615          |
| Wholesale trade.....                                                        | 206                                             | 649                                           | 226,355,608          | 256,086,080          | 407,049,936          |
| Machinery, equipment, and suppliers wholesalers.....                        | 28                                              | 67                                            | 30,434,959           | 25,617,951           | 48,192,394           |
| Drugs and druggists' sundries wholesalers.....                              | 19                                              | 72                                            | 33,420,263           | 41,397,544           | 40,259,189           |
| Grocery and related product wholesalers.....                                | 13                                              | 20                                            | 5,120,940            | 4,237,236            | 6,605,363            |
| Petroleum and petroleum products wholesalers.....                           | 13                                              | 58                                            | 41,685,692           | 51,088,526           | 113,975,431          |
| Other wholesale trade.....                                                  | 153                                             | 432                                           | 115,693,754          | 133,744,823          | 198,017,559          |
| Retail trade .....                                                          | 61                                              | 148                                           | 72,764,420           | 85,112,241           | 127,520,679          |
| Motor vehicle dealers and parts dealers.....                                | 7                                               | 15                                            | 2,421,285            | 3,657,911            | 7,793,103            |
| Food and beverage stores.....                                               | 4                                               | 4                                             | 2,390,219            | 2,619,685            | 8,925,916            |
| Clothing and clothing accessories stores.....                               | 6                                               | 14                                            | 2,326,239            | 3,052,180            | 5,182,400            |
| General merchandise stores.....                                             | 5                                               | 20                                            | 27,967,771           | 31,023,176           | 45,130,576           |
| Other retailers.....                                                        | 40                                              | 92                                            | 36,145,524           | 42,769,179           | 57,476,349           |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

**Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected industrial sector of 7,500 largest Controlled Foreign Corporations              | Number of U.S. corporation returns <sup>1</sup> | 7,500 largest Controlled Foreign Corporations |                      |                      |                    |
|------------------------------------------------------------------------------------------|-------------------------------------------------|-----------------------------------------------|----------------------|----------------------|--------------------|
|                                                                                          |                                                 | Number of foreign corporations                | Total assets         |                      | Total receipts     |
|                                                                                          |                                                 |                                               | Beginning of year    | End of year          |                    |
|                                                                                          | (1)                                             | (2)                                           | (3)                  | (4)                  | (5)                |
| <b>Distribution and transportation of goods--continued</b>                               |                                                 |                                               |                      |                      |                    |
| Transportation and warehousing.....                                                      | 33                                              | 67                                            | 12,953,942           | 14,440,519           | 7,557,285          |
| Transportation.....                                                                      | 28                                              | 56                                            | 11,376,692           | 12,985,459           | 6,521,688          |
| Warehousing and storage.....                                                             | 7                                               | 11                                            | 1,577,251            | 1,455,060            | 1,035,597          |
| <b>Information.....</b>                                                                  | <b>67</b>                                       | <b>240</b>                                    | <b>163,962,626</b>   | <b>187,829,896</b>   | <b>54,766,307</b>  |
| Publishing industries.....                                                               | 20                                              | 50                                            | 17,381,475           | 17,142,002           | 10,914,766         |
| Broadcasting and telecommunications.....                                                 | 36                                              | 140                                           | 132,311,192          | 156,246,214          | 32,214,178         |
| Other information industries.....                                                        | 17                                              | 50                                            | 14,269,959           | 14,441,680           | 11,637,363         |
| <b>Finance, insurance, real estate, and rental and leasing .....</b>                     | <b>387</b>                                      | <b>1,816</b>                                  | <b>2,167,688,681</b> | <b>2,586,532,983</b> | <b>254,388,811</b> |
| Depository credit intermediation.....                                                    | 29                                              | 96                                            | 228,907,264          | 237,918,529          | 18,765,503         |
| Nondepository credit intermediation.....                                                 | 107                                             | 398                                           | 331,310,936          | 389,907,377          | 31,338,719         |
| Security, commodity contracts, and other financial investments and related products..... | 197                                             | 615                                           | 1,099,056,193        | 1,343,653,261        | 82,767,345         |
| Insurance carriers and related activities.....                                           | 79                                              | 290                                           | 276,669,077          | 313,568,810          | 65,435,662         |
| Funds, trusts, and other financial activities.....                                       | 64                                              | 195                                           | 167,273,613          | 240,423,156          | 41,315,773         |
| Real estate and rental and leasing .....                                                 | 73                                              | 222                                           | 64,471,598           | 61,061,850           | 14,765,809         |
| <b>Services.....</b>                                                                     | <b>585</b>                                      | <b>1,957</b>                                  | <b>987,991,217</b>   | <b>1,200,433,796</b> | <b>244,329,784</b> |
| Professional and business services.....                                                  | 567                                             | 1,844                                         | 945,378,977          | 1,156,524,093        | 222,553,791        |
| Education, health, and social assistance.....                                            | 8                                               | 19                                            | 2,460,377            | 2,742,737            | 999,814            |
| Leisure, accommodation, and food services.....                                           | 22                                              | 65                                            | 28,884,712           | 30,094,491           | 16,048,100         |
| Other services .....                                                                     | 17                                              | 29                                            | 11,267,151           | 11,072,475           | 4,728,080          |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

**Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected industrial sector of 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued        |                   |                                                                |                                                                                |                   |                                                 |
|-----------------------------------------------------------------------------|-----------------------------------------------------------------|-------------------|----------------------------------------------------------------|--------------------------------------------------------------------------------|-------------------|-------------------------------------------------|
|                                                                             | Current earnings and profits (less deficit) before income taxes | Income taxes      | Current earnings and profits (less deficit) after income taxes | Foreign corporations with current earnings and profits (+) before income taxes |                   |                                                 |
|                                                                             |                                                                 |                   |                                                                | Current earnings and profits before income taxes                               | Income taxes      | Current earnings and profits after income taxes |
|                                                                             | (6)                                                             | (7)               | (8)                                                            | (9)                                                                            | (10)              | (11)                                            |
| <b>All industries.....</b>                                                  | <b>200,670,364</b>                                              | <b>38,610,284</b> | <b>162,060,079</b>                                             | <b>251,715,617</b>                                                             | <b>37,261,414</b> | <b>214,454,204</b>                              |
| <b>Raw materials and energy production.....</b>                             | <b>18,780,847</b>                                               | <b>5,742,786</b>  | <b>13,038,061</b>                                              | <b>22,342,228</b>                                                              | <b>5,424,073</b>  | <b>16,918,155</b>                               |
| Agriculture, forestry, and fishing .....                                    | 381,076                                                         | 54,957            | 326,119                                                        | 433,469                                                                        | 54,011            | 379,458                                         |
| Mining.....                                                                 | 15,489,841                                                      | 5,167,465         | 10,322,377                                                     | 17,866,549                                                                     | 4,982,123         | 12,884,427                                      |
| Oil and gas extraction.....                                                 | 14,693,190                                                      | 4,916,979         | 9,776,210                                                      | 16,733,207                                                                     | 4,792,087         | 11,941,121                                      |
| Metal ore mining.....                                                       | 366,977                                                         | 81,521            | 285,456                                                        | 619,563                                                                        | 63,370            | 556,193                                         |
| Other mining.....                                                           | 429,674                                                         | 168,964           | 260,710                                                        | 513,779                                                                        | 126,666           | 387,114                                         |
| Utilities.....                                                              | 2,909,929                                                       | 520,365           | 2,389,565                                                      | 4,042,210                                                                      | 387,939           | 3,654,271                                       |
| <b>Goods production.....</b>                                                | <b>80,199,064</b>                                               | <b>14,919,504</b> | <b>65,279,560</b>                                              | <b>94,621,373</b>                                                              | <b>14,543,805</b> | <b>80,077,569</b>                               |
| Construction .....                                                          | 862,118                                                         | 189,586           | 672,532                                                        | 943,045                                                                        | 182,897           | 760,149                                         |
| Construction of buildings, heavy construction, and civil engineering.....   | 152,661                                                         | 45,791            | 106,870                                                        | 152,776                                                                        | 48,326            | 104,451                                         |
| Specialty trade contractors.....                                            | 709,457                                                         | 143,795           | 565,663                                                        | 790,269                                                                        | 134,571           | 655,698                                         |
| Manufacturing .....                                                         | 79,336,946                                                      | 14,729,918        | 64,607,027                                                     | 93,678,328                                                                     | 14,360,908        | 79,317,420                                      |
| Food manufacturing.....                                                     | 4,793,443                                                       | 1,167,103         | 3,626,339                                                      | 5,309,988                                                                      | 1,138,711         | 4,171,276                                       |
| Beverage and tobacco product manufacturing.....                             | 7,542,271                                                       | 1,653,453         | 5,888,818                                                      | 7,705,144                                                                      | 1,642,948         | 6,062,195                                       |
| Textile mills and textile product mills.....                                | 56,111                                                          | 18,272            | 37,839                                                         | 94,881                                                                         | 18,270            | 76,610                                          |
| Apparel manufacturing.....                                                  | 468,355                                                         | 47,925            | 420,429                                                        | 551,319                                                                        | 48,010            | 503,309                                         |
| Wood product manufacturing.....                                             | -109,548                                                        | -8,390            | -101,157                                                       | 9,311                                                                          | 1,945             | 7,365                                           |
| Paper manufacturing.....                                                    | 1,498,892                                                       | 419,544           | 1,079,348                                                      | 1,918,348                                                                      | 414,014           | 1,504,334                                       |
| Petroleum and coal products manufacturing.....                              | 2,445,820                                                       | 759,969           | 1,685,851                                                      | 3,174,123                                                                      | 754,481           | 2,419,642                                       |
| Chemical manufacturing.....                                                 | 38,911,613                                                      | 4,789,830         | 34,121,783                                                     | 41,160,750                                                                     | 4,651,742         | 36,509,008                                      |
| Pharmaceutical and medicine manufacturing.....                              | 34,202,954                                                      | 3,536,233         | 30,666,721                                                     | 34,886,701                                                                     | 3,403,482         | 31,483,219                                      |
| Other chemical manufacturing.....                                           | 4,708,659                                                       | 1,253,597         | 3,455,062                                                      | 6,274,049                                                                      | 1,248,260         | 5,025,789                                       |
| Plastics and rubber products manufacturing.....                             | 931,085                                                         | 239,752           | 691,333                                                        | 1,072,108                                                                      | 211,999           | 860,109                                         |
| Nonmetallic mineral product manufacturing.....                              | 1,162,155                                                       | 274,550           | 887,605                                                        | 1,199,088                                                                      | 270,161           | 928,927                                         |
| Primary metal manufacturing.....                                            | 1,268,872                                                       | 337,461           | 931,411                                                        | 1,443,196                                                                      | 323,337           | 1,119,859                                       |
| Fabricated metal product manufacturing.....                                 | 475,357                                                         | 212,250           | 263,107                                                        | 687,007                                                                        | 207,341           | 479,666                                         |
| Machinery manufacturing.....                                                | 716,139                                                         | 319,122           | 397,017                                                        | 1,336,087                                                                      | 299,661           | 1,036,425                                       |
| Computer and electronic product manufacturing.....                          | 7,028,027                                                       | 1,317,922         | 5,710,105                                                      | 10,831,183                                                                     | 1,343,117         | 9,488,066                                       |
| Electric equipment, appliance, and component manufacturing.....             | 1,814,186                                                       | 314,341           | 1,499,845                                                      | 2,533,447                                                                      | 291,842           | 2,241,605                                       |
| Transportation equipment manufacturing.....                                 | 5,426,543                                                       | 1,961,983         | 3,464,560                                                      | 9,267,549                                                                      | 1,900,164         | 7,367,385                                       |
| Motor vehicles and parts manufacturing.....                                 | 4,480,253                                                       | 1,844,745         | 2,635,508                                                      | 8,227,906                                                                      | 1,784,174         | 6,443,732                                       |
| Other transportation equipment manufacturing.....                           | 946,290                                                         | 117,238           | 829,052                                                        | 1,039,644                                                                      | 115,990           | 923,653                                         |
| Furniture and related product manufacturing.....                            | 66,066                                                          | 20,635            | 45,431                                                         | 97,085                                                                         | 21,724            | 75,361                                          |
| Miscellaneous manufacturing.....                                            | 4,841,559                                                       | 884,196           | 3,957,362                                                      | 5,287,716                                                                      | 821,440           | 4,466,276                                       |
| <b>Distribution and transportation of goods.....</b>                        | <b>23,972,584</b>                                               | <b>5,486,881</b>  | <b>18,485,703</b>                                              | <b>27,620,715</b>                                                              | <b>5,358,517</b>  | <b>22,262,198</b>                               |
| Wholesale and retail trade.....                                             | 24,087,497                                                      | 5,396,802         | 18,690,694                                                     | 27,085,602                                                                     | 5,276,467         | 21,809,135                                      |
| Wholesale trade.....                                                        | 17,651,971                                                      | 3,471,526         | 14,180,445                                                     | 20,020,292                                                                     | 3,365,251         | 16,655,042                                      |
| Machinery, equipment, and suppliers wholesalers.....                        | 2,451,827                                                       | 596,907           | 1,854,920                                                      | 2,640,808                                                                      | 594,507           | 2,046,301                                       |
| Drugs and druggists' sundries wholesalers.....                              | 4,187,842                                                       | 646,968           | 3,540,874                                                      | 4,597,063                                                                      | 643,096           | 3,953,967                                       |
| Grocery and related product wholesalers.....                                | 467,109                                                         | 69,289            | 397,820                                                        | 492,245                                                                        | 68,497            | 423,748                                         |
| Petroleum and petroleum products wholesalers.....                           | 2,350,963                                                       | 156,989           | 2,193,975                                                      | 2,715,983                                                                      | 156,296           | 2,559,687                                       |
| Other wholesale trade.....                                                  | 8,194,229                                                       | 2,001,373         | 6,192,856                                                      | 9,574,194                                                                      | 1,902,855         | 7,671,338                                       |
| Retail trade .....                                                          | 6,435,526                                                       | 1,925,277         | 4,510,249                                                      | 7,065,310                                                                      | 1,911,216         | 5,154,093                                       |
| Motor vehicle dealers and parts dealers.....                                | -97,578                                                         | 33,054            | -130,632                                                       | 125,872                                                                        | 25,638            | 100,234                                         |
| Food and beverage stores.....                                               | 214,046                                                         | 89,679            | 124,368                                                        | 214,046                                                                        | 89,679            | 124,368                                         |
| Clothing and clothing accessories stores.....                               | 423,832                                                         | 66,741            | 357,091                                                        | 471,925                                                                        | 62,856            | 409,069                                         |
| General merchandise stores.....                                             | 1,101,312                                                       | 351,481           | 749,830                                                        | 1,177,627                                                                      | 351,481           | 826,146                                         |
| Other retailers.....                                                        | 4,489,888                                                       | 1,316,788         | 3,173,100                                                      | 4,771,815                                                                      | 1,314,029         | 3,457,785                                       |

Footnotes at end of table.



# Controlled Foreign Corporations, 2002

**Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected industrial sector of 7,500 largest Controlled Foreign Corporations              | 7,500 largest Controlled Foreign Corporations--Continued        |                  |                                                                |                                                                                |                  |                                                 |
|------------------------------------------------------------------------------------------|-----------------------------------------------------------------|------------------|----------------------------------------------------------------|--------------------------------------------------------------------------------|------------------|-------------------------------------------------|
|                                                                                          | Current earnings and profits (less deficit) before income taxes | Income taxes     | Current earnings and profits (less deficit) after income taxes | Foreign corporations with current earnings and profits (+) before income taxes |                  |                                                 |
|                                                                                          |                                                                 |                  |                                                                | Current earnings and profits before income taxes                               | Income taxes     | Current earnings and profits after income taxes |
|                                                                                          | (6)                                                             | (7)              | (8)                                                            | (9)                                                                            | (10)             | (11)                                            |
| <b>Distribution and transportation of goods--continued</b>                               |                                                                 |                  |                                                                |                                                                                |                  |                                                 |
| Transportation and warehousing.....                                                      | -114,913                                                        | 90,078           | -204,991                                                       | 535,114                                                                        | 82,050           | 453,063                                         |
| Transportation.....                                                                      | -4,706                                                          | 83,130           | -87,835                                                        | 473,158                                                                        | 75,106           | 398,052                                         |
| Warehousing and storage.....                                                             | -110,207                                                        | 6,949            | -117,156                                                       | 61,956                                                                         | 6,944            | 55,012                                          |
| <b>Information.....</b>                                                                  | <b>-4,054,940</b>                                               | <b>1,289,700</b> | <b>-5,344,639</b>                                              | <b>8,122,012</b>                                                               | <b>1,270,880</b> | <b>6,851,132</b>                                |
| Publishing industries.....                                                               | 2,096,195                                                       | 388,297          | 1,707,899                                                      | 2,174,765                                                                      | 374,896          | 1,799,869                                       |
| Broadcasting and telecommunications.....                                                 | -6,979,545                                                      | 609,401          | -7,588,946                                                     | 4,735,648                                                                      | 605,501          | 4,130,148                                       |
| Other information industries.....                                                        | 828,410                                                         | 292,002          | 536,408                                                        | 1,211,598                                                                      | 290,484          | 921,115                                         |
| <b>Finance, insurance, real estate, and rental and leasing .....</b>                     | <b>39,443,103</b>                                               | <b>6,536,216</b> | <b>32,906,887</b>                                              | <b>46,381,261</b>                                                              | <b>6,228,796</b> | <b>40,152,465</b>                               |
| Depository credit intermediation.....                                                    | 3,338,486                                                       | 738,294          | 2,600,192                                                      | 3,496,993                                                                      | 728,205          | 2,768,788                                       |
| Nondepository credit intermediation.....                                                 | 7,269,495                                                       | 1,560,538        | 5,708,958                                                      | 7,879,266                                                                      | 1,534,065        | 6,345,201                                       |
| Security, commodity contracts, and other financial investments and related products..... | 12,251,320                                                      | 2,311,181        | 9,940,140                                                      | 14,465,080                                                                     | 2,155,928        | 12,309,152                                      |
| Insurance carriers and related activities.....                                           | 8,805,548                                                       | 1,036,859        | 7,768,688                                                      | 11,296,371                                                                     | 973,135          | 10,323,237                                      |
| Funds, trusts, and other financial activities.....                                       | 6,242,463                                                       | 366,381          | 5,876,082                                                      | 6,798,958                                                                      | 361,336          | 6,437,623                                       |
| Real estate and rental and leasing .....                                                 | 1,535,790                                                       | 522,963          | 1,012,827                                                      | 2,444,593                                                                      | 476,129          | 1,968,464                                       |
| <b>Services.....</b>                                                                     | <b>42,329,705</b>                                               | <b>4,635,197</b> | <b>37,694,508</b>                                              | <b>52,628,029</b>                                                              | <b>4,435,343</b> | <b>48,192,686</b>                               |
| Professional and business services.....                                                  | 39,723,444                                                      | 4,139,534        | 35,583,910                                                     | 49,601,109                                                                     | 3,965,462        | 45,635,647                                      |
| Education, health, and social assistance.....                                            | 25,653                                                          | 28,318           | -2,665                                                         | 137,965                                                                        | 20,390           | 117,575                                         |
| Leisure, accommodation, and food services.....                                           | 2,122,760                                                       | 412,194          | 1,710,565                                                      | 2,394,039                                                                      | 394,570          | 1,999,469                                       |
| Other services .....                                                                     | 457,849                                                         | 55,151           | 402,698                                                        | 494,916                                                                        | 54,921           | 439,995                                         |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

**Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected industrial sector of 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued |                                           |                                       |                                                |                        |
|-----------------------------------------------------------------------------|----------------------------------------------------------|-------------------------------------------|---------------------------------------|------------------------------------------------|------------------------|
|                                                                             | Distributions out of earnings and profits                |                                           |                                       | Dividends paid to controlling U.S. corporation | Total Subpart F income |
|                                                                             | Total                                                    | Not previously taxed earnings and profits | Previously taxed earnings and profits |                                                |                        |
|                                                                             | (12)                                                     | (13)                                      | (14)                                  | (15)                                           | (16)                   |
| <b>All industries.....</b>                                                  | <b>97,011,345</b>                                        | <b>58,556,699</b>                         | <b>38,454,646</b>                     | <b>27,045,099</b>                              | <b>31,420,940</b>      |
| <b>Raw materials and energy production.....</b>                             | <b>8,348,244</b>                                         | <b>7,586,220</b>                          | <b>762,023</b>                        | <b>2,566,104</b>                               | <b>1,220,497</b>       |
| Agriculture, forestry, and fishing .....                                    | 64,493                                                   | 62,633                                    | 1,860                                 | 43,194                                         | 17,740                 |
| Mining.....                                                                 | 5,850,826                                                | 5,189,575                                 | 661,250                               | 2,200,913                                      | 1,042,282              |
| Oil and gas extraction.....                                                 | 5,452,087                                                | 4,901,761                                 | 550,326                               | 1,947,774                                      | 865,471                |
| Metal ore mining.....                                                       | 155,545                                                  | 107,723                                   | 47,822                                | 81,604                                         | 42,818                 |
| Other mining.....                                                           | 243,193                                                  | 180,091                                   | 63,102                                | 171,535                                        | 133,993                |
| Utilities.....                                                              | 2,432,925                                                | 2,334,012                                 | 98,913                                | 321,998                                        | 160,475                |
| <b>Goods production.....</b>                                                | <b>32,217,593</b>                                        | <b>20,894,615</b>                         | <b>11,322,978</b>                     | <b>10,144,624</b>                              | <b>9,796,240</b>       |
| Construction .....                                                          | 317,606                                                  | 308,495                                   | 9,111                                 | 15,955                                         | 257,279                |
| Construction of buildings, heavy construction, and civil engineering.....   | 26,131                                                   | 25,964                                    | 167                                   | 5,038                                          | 3,135                  |
| Specialty trade contractors.....                                            | 291,475                                                  | 282,530                                   | 8,944                                 | 10,917                                         | 254,144                |
| Manufacturing .....                                                         | 31,899,987                                               | 20,586,120                                | 11,313,867                            | 10,128,669                                     | 9,538,960              |
| Food manufacturing.....                                                     | 2,374,751                                                | 1,767,028                                 | 607,723                               | 811,877                                        | 714,523                |
| Beverage and tobacco product manufacturing.....                             | 2,742,800                                                | 1,843,670                                 | 899,130                               | 1,078,331                                      | 1,115,988              |
| Textile mills and textile product mills.....                                | 11,610                                                   | 10,730                                    | 880                                   | 8,370                                          | 22,946                 |
| Apparel manufacturing.....                                                  | 244,151                                                  | 134,564                                   | 109,587                               | 104,562                                        | 122,710                |
| Wood product manufacturing.....                                             | --                                                       | --                                        | --                                    | --                                             | 1,759                  |
| Paper manufacturing.....                                                    | 724,188                                                  | 549,226                                   | 174,962                               | 34,138                                         | 100,095                |
| Petroleum and coal products manufacturing.....                              | 2,591,210                                                | 1,554,980                                 | 1,036,230                             | 123,120                                        | 528,471                |
| Chemical manufacturing.....                                                 | 8,143,486                                                | 4,790,397                                 | 3,353,089                             | 2,978,118                                      | 2,154,710              |
| Pharmaceutical and medicine manufacturing.....                              | 5,763,223                                                | 3,178,999                                 | 2,584,224                             | 2,019,434                                      | 1,523,284              |
| Other chemical manufacturing.....                                           | 2,380,263                                                | 1,611,397                                 | 768,866                               | 958,684                                        | 631,426                |
| Plastics and rubber products manufacturing.....                             | 433,039                                                  | 359,845                                   | 73,194                                | 160,624                                        | 34,026                 |
| Nonmetallic mineral product manufacturing.....                              | 525,643                                                  | 327,257                                   | 198,386                               | 183,441                                        | 57,025                 |
| Primary metal manufacturing.....                                            | 967,684                                                  | 498,206                                   | 469,478                               | 253,955                                        | 43,858                 |
| Fabricated metal product manufacturing.....                                 | 191,076                                                  | 150,580                                   | 40,496                                | 62,110                                         | 101,032                |
| Machinery manufacturing.....                                                | 387,127                                                  | 312,179                                   | 74,948                                | 107,982                                        | 186,195                |
| Computer and electronic product manufacturing.....                          | 7,840,381                                                | 5,481,106                                 | 2,359,275                             | 2,716,198                                      | 2,193,106              |
| Electric equipment, appliance, and component manufacturing.....             | 635,389                                                  | 355,128                                   | 280,261                               | 194,913                                        | 145,106                |
| Transportation equipment manufacturing.....                                 | 2,385,826                                                | 978,186                                   | 1,407,640                             | 504,692                                        | 1,706,563              |
| Motor vehicles and parts manufacturing.....                                 | 2,268,319                                                | 894,067                                   | 1,374,252                             | 504,692                                        | 1,655,719              |
| Other transportation equipment manufacturing.....                           | 117,507                                                  | 84,119                                    | 33,388                                | --                                             | 50,844                 |
| Furniture and related product manufacturing.....                            | 13,443                                                   | 13,443                                    | --                                    | 729                                            | --                     |
| Miscellaneous manufacturing.....                                            | 1,688,184                                                | 1,459,596                                 | 228,588                               | 805,507                                        | 310,847                |
| <b>Distribution and transportation of goods.....</b>                        | <b>12,168,493</b>                                        | <b>5,879,920</b>                          | <b>6,288,573</b>                      | <b>3,471,956</b>                               | <b>4,015,285</b>       |
| Wholesale and retail trade.....                                             | 11,717,563                                               | 5,769,547                                 | 5,948,016                             | 3,470,407                                      | 3,905,922              |
| Wholesale trade.....                                                        | 10,324,850                                               | 5,141,985                                 | 5,182,865                             | 2,956,860                                      | 3,137,914              |
| Machinery, equipment, and suppliers wholesalers.....                        | 1,756,986                                                | 405,755                                   | 1,351,231                             | 83,064                                         | 171,037                |
| Drugs and druggists' sundries wholesalers.....                              | 2,786,875                                                | 1,445,340                                 | 1,341,535                             | 590,285                                        | 980,624                |
| Grocery and related product wholesalers.....                                | 163,109                                                  | 106,458                                   | 56,651                                | 62,819                                         | 43,266                 |
| Petroleum and petroleum products wholesalers.....                           | 2,325,592                                                | 1,266,194                                 | 1,059,398                             | 1,217,146                                      | 795,747                |
| Other wholesale trade.....                                                  | 3,292,289                                                | 1,918,239                                 | 1,374,050                             | 1,003,546                                      | 1,147,239              |
| Retail trade .....                                                          | 1,392,713                                                | 627,562                                   | 765,151                               | 513,547                                        | 768,008                |
| Motor vehicle dealers and parts dealers.....                                | --                                                       | --                                        | --                                    | --                                             | 661                    |
| Food and beverage stores.....                                               | --                                                       | --                                        | --                                    | --                                             | --                     |
| Clothing and clothing accessories stores.....                               | 255,683                                                  | 10,663                                    | 245,020                               | 10,663                                         | 241,271                |
| General merchandise stores.....                                             | 161,266                                                  | 4,078                                     | 157,188                               | --                                             | 45,233                 |
| Other retailers.....                                                        | 975,764                                                  | 612,821                                   | 362,943                               | 502,883                                        | 480,843                |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

**Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected industrial sector of 7,500 largest Controlled Foreign Corporations              | 7,500 largest Controlled Foreign Corporations--Continued |                                           |                                       |                                                |                        |
|------------------------------------------------------------------------------------------|----------------------------------------------------------|-------------------------------------------|---------------------------------------|------------------------------------------------|------------------------|
|                                                                                          | Distributions out of earnings and profits                |                                           |                                       | Dividends paid to controlling U.S. corporation | Total Subpart F income |
|                                                                                          | Total                                                    | Not previously taxed earnings and profits | Previously taxed earnings and profits |                                                |                        |
|                                                                                          | (12)                                                     | (13)                                      | (14)                                  | (15)                                           | (16)                   |
| <b>Distribution and transportation of goods--continued</b>                               |                                                          |                                           |                                       |                                                |                        |
| Transportation and warehousing.....                                                      | 450,930                                                  | 110,373                                   | 340,558                               | 1,549                                          | 109,363                |
| Transportation.....                                                                      | 432,628                                                  | 92,104                                    | 340,524                               | 1,549                                          | 107,843                |
| Warehousing and storage.....                                                             | 18,302                                                   | 18,269                                    | 33                                    | --                                             | 1,520                  |
| <b>Information.....</b>                                                                  | <b>1,455,156</b>                                         | <b>1,273,372</b>                          | <b>181,784</b>                        | <b>632,771</b>                                 | <b>1,028,793</b>       |
| Publishing industries.....                                                               | 464,470                                                  | 407,349                                   | 57,121                                | 177,993                                        | 100,511                |
| Broadcasting and telecommunications.....                                                 | 674,479                                                  | 615,433                                   | 59,046                                | 213,764                                        | 852,096                |
| Other information industries.....                                                        | 316,206                                                  | 250,590                                   | 65,617                                | 241,015                                        | 76,185                 |
| <b>Finance, insurance, real estate, and rental and leasing .....</b>                     | <b>14,319,415</b>                                        | <b>6,115,098</b>                          | <b>8,204,317</b>                      | <b>2,060,460</b>                               | <b>7,233,374</b>       |
| Depository credit intermediation.....                                                    | 1,579,005                                                | 1,111,123                                 | 467,882                               | 687,527                                        | 161,356                |
| Nondepository credit intermediation.....                                                 | 2,062,099                                                | 1,031,141                                 | 1,030,958                             | 375,617                                        | 923,145                |
| Security, commodity contracts, and other financial investments and related products..... | 5,630,826                                                | 2,246,886                                 | 3,383,940                             | 520,901                                        | 3,383,411              |
| Insurance carriers and related activities.....                                           | 2,096,563                                                | 609,716                                   | 1,486,848                             | 163,217                                        | 885,639                |
| Funds, trusts, and other financial activities.....                                       | 1,635,832                                                | 230,618                                   | 1,405,213                             | 123,451                                        | 1,575,701              |
| Real estate and rental and leasing .....                                                 | 1,315,090                                                | 885,614                                   | 429,476                               | 189,747                                        | 304,122                |
| <b>Services.....</b>                                                                     | <b>28,502,444</b>                                        | <b>16,807,474</b>                         | <b>11,694,970</b>                     | <b>8,169,184</b>                               | <b>8,126,752</b>       |
| Professional and business services.....                                                  | 27,854,534                                               | 16,406,149                                | 11,448,385                            | 8,056,452                                      | 7,901,023              |
| Education, health, and social assistance.....                                            | 47,651                                                   | 47,651                                    | --                                    | --                                             | 1,494                  |
| Leisure, accommodation, and food services.....                                           | 512,333                                                  | 266,148                                   | 246,185                               | 100,806                                        | 197,820                |
| Other services .....                                                                     | 87,926                                                   | 87,527                                    | 400                                   | 11,926                                         | 26,415                 |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

**Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected industrial sector of 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued |                            |                                |                                                                    |                                                                       |                           |                      |
|-----------------------------------------------------------------------------|----------------------------------------------------------|----------------------------|--------------------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------|---------------------------|----------------------|
|                                                                             | Receipts by foreign corporations from                    |                            |                                |                                                                    |                                                                       |                           |                      |
|                                                                             | All sources                                              | All related parties, total | U.S. corporation filing return | Domestic corporations controlled by U.S. corporation filing return | Any foreign corporations controlled by U.S. corporation filing return | All other related parties | Unrelated parties    |
|                                                                             | (17)                                                     | (18)                       | (19)                           | (20)                                                               | (21)                                                                  | (22)                      | (23)                 |
| <b>All industries.....</b>                                                  | <b>2,280,609,940</b>                                     | <b>672,144,486</b>         | <b>134,511,735</b>             | <b>108,868,037</b>                                                 | <b>428,540,307</b>                                                    | <b>224,408</b>            | <b>1,629,260,926</b> |
| <b>Raw materials and energy production.....</b>                             | <b>113,151,370</b>                                       | <b>17,134,072</b>          | <b>1,082,650</b>               | <b>6,627,779</b>                                                   | <b>9,423,643</b>                                                      | --                        | <b>96,044,796</b>    |
| Agriculture, forestry, and fishing .....                                    | 8,552,367                                                | 2,842,194                  | 41,686                         | 36,392                                                             | 2,764,116                                                             | --                        | 5,710,173            |
| Mining.....                                                                 | 60,167,095                                               | 10,799,843                 | 483,207                        | 6,129,649                                                          | 4,186,987                                                             | --                        | 49,394,745           |
| Oil and gas extraction.....                                                 | 51,507,811                                               | 9,621,424                  | 171,864                        | 5,690,134                                                          | 3,759,426                                                             | --                        | 41,908,867           |
| Metal ore mining.....                                                       | 4,084,466                                                | 506,820                    | 90,238                         | 353,293                                                            | 63,288                                                                | --                        | 3,577,646            |
| Other mining.....                                                           | 4,574,818                                                | 671,599                    | 221,105                        | 86,222                                                             | 364,272                                                               | --                        | 3,908,232            |
| Utilities.....                                                              | 44,431,908                                               | 3,492,035                  | 557,757                        | 461,738                                                            | 2,472,540                                                             | --                        | 40,939,877           |
| <b>Goods production.....</b>                                                | <b>1,071,845,768</b>                                     | <b>395,618,817</b>         | <b>95,374,456</b>              | <b>57,816,467</b>                                                  | <b>242,426,874</b>                                                    | <b>1,020</b>              | <b>681,677,277</b>   |
| Construction .....                                                          | 10,190,352                                               | 618,914                    | 19,250                         | 27,263                                                             | 572,400                                                               | --                        | 9,571,438            |
| Construction of buildings, heavy construction, and civil engineering.....   | 2,202,947                                                | 64,054                     | 18,573                         | 6                                                                  | 45,475                                                                | --                        | 2,138,894            |
| Specialty trade contractors.....                                            | 7,987,404                                                | 554,860                    | 678                            | 27,258                                                             | 526,925                                                               | --                        | 7,432,544            |
| Manufacturing .....                                                         | 1,061,655,417                                            | 394,999,903                | 95,355,206                     | 57,789,203                                                         | 241,854,474                                                           | 1,020                     | 672,105,839          |
| Food manufacturing.....                                                     | 65,505,564                                               | 8,956,317                  | 392,365                        | 1,213,039                                                          | 7,350,913                                                             | --                        | 56,718,660           |
| Beverage and tobacco product manufacturing.....                             | 57,140,462                                               | 14,337,126                 | 45,681                         | 375,888                                                            | 13,915,557                                                            | --                        | 42,816,805           |
| Textile mills and textile product mills.....                                | 997,820                                                  | 259,324                    | 29,466                         | 41,255                                                             | 188,603                                                               | --                        | 738,496              |
| Apparel manufacturing.....                                                  | 6,188,970                                                | 3,353,276                  | 1,009,575                      | 1,011,820                                                          | 1,331,881                                                             | --                        | 2,835,694            |
| Wood product manufacturing.....                                             | 883,514                                                  | 417,954                    | 350,268                        | 7,766                                                              | 59,920                                                                | --                        | 497,702              |
| Paper manufacturing.....                                                    | 23,771,375                                               | 5,665,236                  | 1,899,317                      | 1,401,421                                                          | 2,364,498                                                             | --                        | 18,111,565           |
| Petroleum and coal products manufacturing.....                              | 94,113,877                                               | 26,613,011                 | 2,642,741                      | 2,856,442                                                          | 21,113,828                                                            | --                        | 67,505,741           |
| Chemical manufacturing.....                                                 | 191,446,209                                              | 77,236,977                 | 18,243,914                     | 10,461,638                                                         | 48,530,405                                                            | 1,020                     | 115,653,673          |
| Pharmaceutical and medicine manufacturing.....                              | 113,293,460                                              | 55,670,610                 | 14,980,551                     | 8,467,306                                                          | 32,222,752                                                            | --                        | 58,161,374           |
| Other chemical manufacturing.....                                           | 78,152,750                                               | 21,566,368                 | 3,263,363                      | 1,994,332                                                          | 16,307,653                                                            | 1,020                     | 57,492,299           |
| Plastics and rubber products manufacturing.....                             | 18,597,671                                               | 7,979,006                  | 1,959,196                      | 190,526                                                            | 5,829,284                                                             | --                        | 10,668,704           |
| Nonmetallic mineral product manufacturing.....                              | 9,397,954                                                | 1,490,406                  | 449,786                        | 347,290                                                            | 693,329                                                               | --                        | 7,917,691            |
| Primary metal manufacturing.....                                            | 14,220,827                                               | 3,244,213                  | 497,323                        | 785,707                                                            | 1,961,183                                                             | --                        | 10,978,367           |
| Fabricated metal product manufacturing.....                                 | 12,536,508                                               | 3,162,415                  | 1,044,018                      | 661,334                                                            | 1,457,063                                                             | --                        | 9,376,257            |
| Machinery manufacturing.....                                                | 21,848,507                                               | 5,554,335                  | 1,992,238                      | 546,414                                                            | 3,015,683                                                             | --                        | 16,350,803           |
| Computer and electronic product manufacturing.....                          | 187,812,174                                              | 84,932,347                 | 30,206,138                     | 6,273,214                                                          | 48,452,995                                                            | --                        | 104,669,289          |
| Electric equipment, appliance, and component manufacturing.....             | 32,388,532                                               | 15,834,736                 | 3,543,023                      | 5,590,867                                                          | 6,700,845                                                             | --                        | 17,751,645           |
| Transportation equipment manufacturing.....                                 | 273,405,485                                              | 118,669,323                | 29,592,065                     | 21,982,502                                                         | 67,094,756                                                            | --                        | 155,298,924          |
| Motor vehicles and parts manufacturing.....                                 | 265,564,320                                              | 116,514,076                | 29,130,259                     | 21,365,467                                                         | 66,018,350                                                            | --                        | 149,613,007          |
| Other transportation equipment manufacturing.....                           | 7,841,165                                                | 2,155,248                  | 461,806                        | 617,035                                                            | 1,076,407                                                             | --                        | 5,685,917            |
| Furniture and related product manufacturing.....                            | 1,745,362                                                | 356,722                    | 239,470                        | 78,821                                                             | 38,432                                                                | --                        | 1,388,640            |
| Miscellaneous manufacturing.....                                            | 49,654,606                                               | 16,937,179                 | 1,218,621                      | 3,963,261                                                          | 11,755,297                                                            | --                        | 32,827,185           |
| <b>Distribution and transportation of goods.....</b>                        | <b>542,127,900</b>                                       | <b>126,018,314</b>         | <b>15,284,917</b>              | <b>23,471,611</b>                                                  | <b>87,175,289</b>                                                     | <b>86,497</b>             | <b>417,291,412</b>   |
| Wholesale and retail trade.....                                             | 534,570,615                                              | 124,016,515                | 15,279,259                     | 22,286,293                                                         | 86,364,465                                                            | 86,497                    | 411,733,274          |
| Wholesale trade.....                                                        | 407,049,936                                              | 109,940,741                | 14,552,211                     | 18,303,225                                                         | 76,998,807                                                            | 86,497                    | 298,085,586          |
| Machinery, equipment, and suppliers wholesalers.....                        | 48,192,394                                               | 25,197,550                 | 4,998,932                      | 260,398                                                            | 19,938,221                                                            | --                        | 23,180,049           |
| Drugs and druggists' sundries wholesalers.....                              | 40,259,189                                               | 19,590,138                 | 489,523                        | 2,753,464                                                          | 16,347,150                                                            | --                        | 20,669,051           |
| Grocery and related product wholesalers.....                                | 6,605,363                                                | 1,866,270                  | 268,179                        | 578,768                                                            | 1,019,323                                                             | --                        | 4,739,092            |
| Petroleum and petroleum products wholesalers.....                           | 113,975,431                                              | 15,028,917                 | 837,253                        | 9,558,458                                                          | 4,633,206                                                             | --                        | 99,288,549           |
| Other wholesale trade.....                                                  | 198,017,559                                              | 48,257,865                 | 7,958,324                      | 5,152,137                                                          | 35,060,907                                                            | 86,497                    | 150,208,844          |
| Retail trade .....                                                          | 127,520,679                                              | 14,075,774                 | 727,048                        | 3,983,069                                                          | 9,365,658                                                             | --                        | 113,647,689          |
| Motor vehicle dealers and parts dealers.....                                | 7,793,103                                                | 2,751,375                  | 67,045                         | 1,337,924                                                          | 1,346,406                                                             | --                        | 5,041,728            |
| Food and beverage stores.....                                               | 8,925,916                                                | 18,296                     | 17,780                         | --                                                                 | 517                                                                   | --                        | 8,907,620            |
| Clothing and clothing accessories stores.....                               | 5,182,400                                                | 666,113                    | 55,491                         | 200,771                                                            | 409,851                                                               | --                        | 4,531,001            |
| General merchandise stores.....                                             | 45,130,576                                               | 2,912,656                  | 163                            | 2,358                                                              | 2,910,135                                                             | --                        | 42,217,919           |
| Other retailers.....                                                        | 57,476,349                                               | 7,727,114                  | 586,569                        | 2,442,016                                                          | 4,698,529                                                             | --                        | 49,937,305           |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

**Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected industrial sector of 7,500 largest Controlled Foreign Corporations              | 7,500 largest Controlled Foreign Corporations--Continued |                            |                                |                                                                    |                                                                       |                           |                    |
|------------------------------------------------------------------------------------------|----------------------------------------------------------|----------------------------|--------------------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------|---------------------------|--------------------|
|                                                                                          | Receipts by foreign corporations from                    |                            |                                |                                                                    |                                                                       |                           |                    |
|                                                                                          | All sources                                              | All related parties, total | U.S. corporation filing return | Domestic corporations controlled by U.S. corporation filing return | Any foreign corporations controlled by U.S. corporation filing return | All other related parties | Unrelated parties  |
|                                                                                          | (17)                                                     | (18)                       | (19)                           | (20)                                                               | (21)                                                                  | (22)                      | (23)               |
| <b>Distribution and transportation of goods--continued</b>                               |                                                          |                            |                                |                                                                    |                                                                       |                           |                    |
| Transportation and warehousing.....                                                      | 7,557,285                                                | 2,001,799                  | 5,658                          | 1,185,318                                                          | 810,824                                                               | --                        | 5,558,138          |
| Transportation.....                                                                      | 6,521,688                                                | 1,471,159                  | 2,060                          | 1,166,722                                                          | 302,377                                                               | --                        | 5,053,065          |
| Warehousing and storage.....                                                             | 1,035,597                                                | 530,640                    | 3,598                          | 18,596                                                             | 508,447                                                               | --                        | 505,073            |
| <b>Information.....</b>                                                                  | <b>54,766,307</b>                                        | <b>7,731,322</b>           | <b>502,073</b>                 | <b>2,990,171</b>                                                   | <b>4,231,677</b>                                                      | <b>7,401</b>              | <b>47,601,579</b>  |
| Publishing industries.....                                                               | 10,914,766                                               | 638,523                    | 363,099                        | 103,919                                                            | 171,505                                                               | --                        | 10,283,863         |
| Broadcasting and telecommunications.....                                                 | 32,214,178                                               | 6,336,979                  | 65,397                         | 2,554,248                                                          | 3,709,934                                                             | 7,401                     | 26,436,172         |
| Other information industries.....                                                        | 11,637,363                                               | 755,819                    | 73,577                         | 332,004                                                            | 350,238                                                               | --                        | 10,881,544         |
| <b>Finance, insurance, real estate, and rental and leasing .....</b>                     | <b>254,388,811</b>                                       | <b>58,833,222</b>          | <b>10,479,963</b>              | <b>13,369,042</b>                                                  | <b>34,984,216</b>                                                     | <b>--</b>                 | <b>197,015,072</b> |
| Depository credit intermediation.....                                                    | 18,765,503                                               | 2,178,459                  | 2,778                          | 1,451,161                                                          | 724,520                                                               | --                        | 16,587,044         |
| Nondepository credit intermediation.....                                                 | 31,338,719                                               | 5,721,513                  | 255,148                        | 482,001                                                            | 4,984,364                                                             | --                        | 25,702,267         |
| Security, commodity contracts, and other financial investments and related products..... | 82,767,345                                               | 24,660,848                 | 4,272,709                      | 8,825,694                                                          | 11,562,445                                                            | --                        | 58,787,162         |
| Insurance carriers and related activities.....                                           | 65,435,662                                               | 2,618,188                  | 250,180                        | 925,063                                                            | 1,442,946                                                             | --                        | 62,878,583         |
| Funds, trusts, and other financial activities.....                                       | 41,315,773                                               | 21,159,246                 | 5,622,832                      | 1,255,877                                                          | 14,280,536                                                            | --                        | 20,620,768         |
| Real estate and rental and leasing .....                                                 | 14,765,809                                               | 2,494,968                  | 76,316                         | 429,247                                                            | 1,989,405                                                             | --                        | 12,439,247         |
| <b>Services.....</b>                                                                     | <b>244,329,784</b>                                       | <b>66,808,740</b>          | <b>11,787,676</b>              | <b>4,592,967</b>                                                   | <b>50,298,608</b>                                                     | <b>129,489</b>            | <b>189,630,791</b> |
| Professional and business services.....                                                  | 222,553,791                                              | 63,722,224                 | 11,779,775                     | 4,290,798                                                          | 47,522,161                                                            | 129,489                   | 170,729,364        |
| Education, health, and social assistance.....                                            | 999,814                                                  | 158,258                    | 28                             | 15,397                                                             | 142,833                                                               | --                        | 842,827            |
| Leisure, accommodation, and food services.....                                           | 16,048,100                                               | 1,061,340                  | 7,782                          | 116,345                                                            | 937,213                                                               | --                        | 15,197,396         |
| Other services .....                                                                     | 4,728,080                                                | 1,866,919                  | 91                             | 170,427                                                            | 1,696,401                                                             | --                        | 2,861,204          |

Footnotes at end of table.



# Controlled Foreign Corporations, 2002

**Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected industrial sector of 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued |                            |                                |                                                                    |                                                                       |                           |                      |
|-----------------------------------------------------------------------------|----------------------------------------------------------|----------------------------|--------------------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------|---------------------------|----------------------|
|                                                                             | Payments by foreign corporations to                      |                            |                                |                                                                    |                                                                       |                           |                      |
|                                                                             | All recipients                                           | All related parties, total | U.S. corporation filing return | Domestic corporations controlled by U.S. corporation filing return | Any foreign corporations controlled by U.S. corporation filing return | All other related parties | Unrelated parties    |
|                                                                             | (24)                                                     | (25)                       | (26)                           | (27)                                                               | (28)                                                                  | (29)                      | (30)                 |
| <b>All industries.....</b>                                                  | <b>2,198,534,646</b>                                     | <b>657,141,184</b>         | <b>146,668,914</b>             | <b>117,014,977</b>                                                 | <b>392,364,469</b>                                                    | <b>1,092,825</b>          | <b>1,553,932,369</b> |
| <b>Raw materials and energy production.....</b>                             | <b>105,176,698</b>                                       | <b>15,247,058</b>          | <b>3,285,125</b>               | <b>3,054,775</b>                                                   | <b>8,904,032</b>                                                      | <b>3,126</b>              | <b>90,013,805</b>    |
| Agriculture, forestry, and fishing .....                                    | 8,600,462                                                | 1,341,185                  | 108,233                        | 108,877                                                            | 1,124,075                                                             | --                        | 7,259,276            |
| Mining.....                                                                 | 50,174,191                                               | 9,393,212                  | 2,534,827                      | 2,578,948                                                          | 4,279,437                                                             | --                        | 40,845,761           |
| Oil and gas extraction.....                                                 | 41,917,161                                               | 8,421,564                  | 2,244,659                      | 2,183,593                                                          | 3,993,313                                                             | --                        | 33,560,098           |
| Metal ore mining.....                                                       | 3,946,209                                                | 317,523                    | 76,075                         | 111,659                                                            | 129,789                                                               | --                        | 3,628,686            |
| Other mining.....                                                           | 4,310,821                                                | 654,124                    | 214,093                        | 283,696                                                            | 156,335                                                               | --                        | 3,656,977            |
| Utilities.....                                                              | 46,402,044                                               | 4,512,660                  | 642,065                        | 366,950                                                            | 3,500,519                                                             | 3,126                     | 41,908,767           |
| <b>Goods production.....</b>                                                | <b>1,026,086,490</b>                                     | <b>310,561,710</b>         | <b>75,714,374</b>              | <b>52,232,284</b>                                                  | <b>181,708,884</b>                                                    | <b>906,168</b>            | <b>718,945,659</b>   |
| Construction .....                                                          | 9,628,554                                                | 943,040                    | 62,663                         | 132,227                                                            | 748,150                                                               | --                        | 8,688,047            |
| Construction of buildings, heavy construction, and civil engineering.....   | 2,068,891                                                | 56,186                     | 6,615                          | 3,714                                                              | 45,857                                                                | --                        | 2,012,705            |
| Specialty trade contractors.....                                            | 7,559,663                                                | 886,854                    | 56,048                         | 128,512                                                            | 702,293                                                               | --                        | 6,675,342            |
| Manufacturing .....                                                         | 1,016,457,936                                            | 309,618,670                | 75,651,711                     | 52,100,058                                                         | 180,960,733                                                           | 906,168                   | 710,257,612          |
| Food manufacturing.....                                                     | 63,784,697                                               | 9,854,917                  | 957,023                        | 2,003,903                                                          | 6,893,991                                                             | --                        | 53,997,908           |
| Beverage and tobacco product manufacturing.....                             | 51,898,589                                               | 12,043,804                 | 862,035                        | 3,731,275                                                          | 7,450,494                                                             | --                        | 39,856,052           |
| Textile mills and textile product mills.....                                | 932,590                                                  | 119,826                    | 60,572                         | 17,545                                                             | 41,709                                                                | --                        | 812,764              |
| Apparel manufacturing.....                                                  | 5,937,022                                                | 1,879,617                  | 679,694                        | 480,064                                                            | 719,859                                                               | --                        | 4,057,405            |
| Wood product manufacturing.....                                             | 970,687                                                  | 90,827                     | 23,838                         | 9,472                                                              | 57,517                                                                | --                        | 879,860              |
| Paper manufacturing.....                                                    | 23,031,460                                               | 2,421,613                  | 608,707                        | 413,869                                                            | 1,399,037                                                             | --                        | 20,616,291           |
| Petroleum and coal products manufacturing.....                              | 94,891,590                                               | 27,546,098                 | 763,432                        | 9,071,518                                                          | 16,847,109                                                            | 864,039                   | 67,345,492           |
| Chemical manufacturing.....                                                 | 159,843,673                                              | 59,459,083                 | 15,877,185                     | 11,326,796                                                         | 32,255,103                                                            | --                        | 101,786,748          |
| Pharmaceutical and medicine manufacturing.....                              | 83,868,813                                               | 38,618,304                 | 11,490,810                     | 7,014,098                                                          | 20,113,396                                                            | --                        | 46,391,985           |
| Other chemical manufacturing.....                                           | 75,974,860                                               | 20,840,779                 | 4,386,375                      | 4,312,698                                                          | 12,141,706                                                            | --                        | 55,394,763           |
| Plastics and rubber products manufacturing.....                             | 17,875,765                                               | 4,907,050                  | 975,407                        | 244,568                                                            | 3,687,075                                                             | --                        | 12,989,048           |
| Nonmetallic mineral product manufacturing.....                              | 8,675,125                                                | 1,949,636                  | 435,615                        | 769,228                                                            | 702,697                                                               | 42,097                    | 6,725,489            |
| Primary metal manufacturing.....                                            | 13,813,966                                               | 2,963,793                  | 28,128                         | 792,940                                                            | 2,142,725                                                             | --                        | 10,850,178           |
| Fabricated metal product manufacturing.....                                 | 12,150,677                                               | 2,450,061                  | 955,626                        | 491,048                                                            | 1,003,387                                                             | --                        | 9,716,486            |
| Machinery manufacturing.....                                                | 21,331,252                                               | 4,334,617                  | 1,498,071                      | 858,007                                                            | 1,978,540                                                             | --                        | 17,012,880           |
| Computer and electronic product manufacturing.....                          | 189,823,690                                              | 81,817,782                 | 34,373,562                     | 6,936,130                                                          | 40,508,057                                                            | 32                        | 108,480,328          |
| Electric equipment, appliance, and component manufacturing.....             | 31,187,963                                               | 9,493,465                  | 2,278,363                      | 1,407,115                                                          | 5,807,988                                                             | --                        | 22,828,813           |
| Transportation equipment manufacturing.....                                 | 272,086,717                                              | 73,290,106                 | 12,479,271                     | 10,362,984                                                         | 50,447,850                                                            | --                        | 198,890,424          |
| Motor vehicles and parts manufacturing.....                                 | 264,901,403                                              | 71,666,645                 | 12,283,093                     | 9,650,483                                                          | 49,733,069                                                            | --                        | 193,303,653          |
| Other transportation equipment manufacturing.....                           | 7,185,314                                                | 1,623,461                  | 196,178                        | 712,501                                                            | 714,781                                                               | --                        | 5,586,770            |
| Furniture and related product manufacturing.....                            | 1,681,384                                                | 164,057                    | 119,646                        | 9,669                                                              | 34,742                                                                | --                        | 1,517,327            |
| Miscellaneous manufacturing.....                                            | 46,541,090                                               | 14,832,317                 | 2,675,537                      | 3,173,926                                                          | 8,982,854                                                             | --                        | 31,894,121           |
| <b>Distribution and transportation of goods.....</b>                        | <b>528,537,627</b>                                       | <b>168,313,605</b>         | <b>33,907,475</b>              | <b>25,597,653</b>                                                  | <b>108,648,083</b>                                                    | <b>160,395</b>            | <b>360,981,107</b>   |
| Wholesale and retail trade.....                                             | 520,587,004                                              | 165,994,370                | 33,862,933                     | 24,153,221                                                         | 107,817,821                                                           | 160,395                   | 355,335,070          |
| Wholesale trade.....                                                        | 400,124,707                                              | 148,350,834                | 30,088,342                     | 19,952,284                                                         | 98,149,813                                                            | 160,395                   | 252,454,433          |
| Machinery, equipment, and suppliers wholesalers.....                        | 48,899,088                                               | 35,725,294                 | 7,928,527                      | 2,242,086                                                          | 25,554,681                                                            | --                        | 13,385,511           |
| Drugs and druggists' sundries wholesalers.....                              | 38,440,753                                               | 16,697,469                 | 2,337,989                      | 1,704,630                                                          | 12,654,850                                                            | --                        | 21,770,884           |
| Grocery and related product wholesalers.....                                | 6,289,449                                                | 2,575,701                  | 116,272                        | 27,724                                                             | 2,431,705                                                             | --                        | 3,713,748            |
| Petroleum and petroleum products wholesalers.....                           | 112,536,154                                              | 13,388,378                 | 171,420                        | 7,266,866                                                          | 5,950,092                                                             | --                        | 99,282,444           |
| Other wholesale trade.....                                                  | 193,959,262                                              | 79,963,991                 | 19,534,135                     | 8,710,977                                                          | 51,558,484                                                            | 160,395                   | 114,301,846          |
| Retail trade .....                                                          | 120,462,298                                              | 17,643,536                 | 3,774,591                      | 4,200,937                                                          | 9,668,008                                                             | --                        | 102,880,637          |
| Motor vehicle dealers and parts dealers.....                                | 7,925,845                                                | 5,605,196                  | 116,061                        | 920,157                                                            | 4,568,979                                                             | --                        | 2,320,649            |
| Food and beverage stores.....                                               | 8,679,017                                                | 228,969                    | 158,784                        | 41,077                                                             | 29,108                                                                | --                        | 8,450,048            |
| Clothing and clothing accessories stores.....                               | 5,032,709                                                | 1,153,134                  | 140,512                        | 246,440                                                            | 766,182                                                               | --                        | 3,879,575            |
| General merchandise stores.....                                             | 43,582,871                                               | 1,961,035                  | 595,234                        | 405,495                                                            | 960,306                                                               | --                        | 41,621,836           |
| Other retailers.....                                                        | 52,542,331                                               | 8,587,232                  | 2,764,000                      | 2,543,530                                                          | 3,279,702                                                             | --                        | 44,016,975           |

Footnotes at end of table.

## Controlled Foreign Corporations, 2002

**Table 1.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected industrial sector of 7,500 largest Controlled Foreign Corporations              | 7,500 largest Controlled Foreign Corporations--Continued |                            |                                |                                                                    |                                                                       |                           |                    |
|------------------------------------------------------------------------------------------|----------------------------------------------------------|----------------------------|--------------------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------|---------------------------|--------------------|
|                                                                                          | Payments by foreign corporations to                      |                            |                                |                                                                    |                                                                       |                           |                    |
|                                                                                          | All recipients                                           | All related parties, total | U.S. corporation filing return | Domestic corporations controlled by U.S. corporation filing return | Any foreign corporations controlled by U.S. corporation filing return | All other related parties | Unrelated parties  |
|                                                                                          | (24)                                                     | (25)                       | (26)                           | (27)                                                               | (28)                                                                  | (29)                      | (30)               |
| <b>Distribution and transportation of goods--continued</b>                               |                                                          |                            |                                |                                                                    |                                                                       |                           |                    |
| Transportation and warehousing.....                                                      | 7,950,622                                                | 2,319,235                  | 44,542                         | 1,444,432                                                          | 830,262                                                               | --                        | 5,646,037          |
| Transportation.....                                                                      | 6,897,176                                                | 1,816,334                  | 33,573                         | 1,397,442                                                          | 385,319                                                               | --                        | 5,095,491          |
| Warehousing and storage.....                                                             | 1,053,447                                                | 502,901                    | 10,968                         | 46,990                                                             | 444,943                                                               | --                        | 550,546            |
| <b>Information.....</b>                                                                  | <b>59,095,159</b>                                        | <b>9,417,221</b>           | <b>2,401,162</b>               | <b>2,856,872</b>                                                   | <b>4,159,187</b>                                                      | <b>--</b>                 | <b>49,679,561</b>  |
| Publishing industries.....                                                               | 8,901,573                                                | 2,240,549                  | 1,096,667                      | 560,136                                                            | 583,746                                                               | --                        | 6,662,647          |
| Broadcasting and telecommunications.....                                                 | 39,075,072                                               | 3,900,025                  | 290,600                        | 778,234                                                            | 2,831,190                                                             | --                        | 35,175,048         |
| Other information industries.....                                                        | 11,118,513                                               | 3,276,647                  | 1,013,895                      | 1,518,501                                                          | 744,251                                                               | --                        | 7,841,866          |
| <b>Finance, insurance, real estate, and rental and leasing</b>                           | <b>230,923,473</b>                                       | <b>58,394,867</b>          | <b>8,740,325</b>               | <b>15,590,404</b>                                                  | <b>34,042,638</b>                                                     | <b>21,500</b>             | <b>173,511,078</b> |
| Depository credit intermediation.....                                                    | 16,497,225                                               | 4,142,529                  | 28,269                         | 2,455,939                                                          | 1,658,321                                                             | --                        | 12,386,669         |
| Nondepository credit intermediation.....                                                 | 25,822,870                                               | 8,962,510                  | 771,228                        | 2,442,127                                                          | 5,749,155                                                             | --                        | 17,349,589         |
| Security, commodity contracts, and other financial investments and related products..... | 76,891,988                                               | 23,605,854                 | 3,808,090                      | 6,786,824                                                          | 13,005,933                                                            | 5,007                     | 53,350,526         |
| Insurance carriers and related activities.....                                           | 64,058,899                                               | 4,092,779                  | 80,844                         | 1,598,575                                                          | 2,397,870                                                             | 15,491                    | 59,966,930         |
| Funds, trusts, and other financial activities.....                                       | 32,210,152                                               | 14,165,064                 | 3,780,952                      | 1,550,383                                                          | 8,833,729                                                             | --                        | 18,194,490         |
| Real estate and rental and leasing .....                                                 | 15,442,339                                               | 3,426,131                  | 270,942                        | 756,556                                                            | 2,397,631                                                             | 1,002                     | 12,262,875         |
| <b>Services.....</b>                                                                     | <b>248,715,199</b>                                       | <b>95,206,725</b>          | <b>22,620,453</b>              | <b>17,682,990</b>                                                  | <b>54,901,645</b>                                                     | <b>1,636</b>              | <b>160,801,159</b> |
| Professional and business services.....                                                  | 228,120,921                                              | 92,525,311                 | 21,670,046                     | 16,945,307                                                         | 53,909,638                                                            | 320                       | 142,887,950        |
| Education, health, and social assistance.....                                            | 1,191,075                                                | 143,935                    | 11,705                         | 11,548                                                             | 120,682                                                               | --                        | 1,047,140          |
| Leisure, accommodation, and food services.....                                           | 15,038,442                                               | 1,930,499                  | 804,054                        | 486,692                                                            | 638,436                                                               | 1,317                     | 13,107,943         |
| Other services .....                                                                     | 4,364,761                                                | 606,980                    | 134,649                        | 239,443                                                            | 232,888                                                               | --                        | 3,758,125          |

<sup>1</sup> Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one industrial sector. The industrial activity of the parent corporations filing the returns often differs from that of the Controlled Foreign Corporations.

NOTE: Detail may not add to totals because of rounding and because data are shown for selected sectors only.

# Controlled Foreign Corporations, 2002

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

[Money amounts are in thousands of dollars]

| Selected country of incorporation of the 7,500 largest Controlled Foreign Corporations | Number of U.S. corporation returns | 7,500 largest Controlled Foreign Corporations |                      |                      |                      |
|----------------------------------------------------------------------------------------|------------------------------------|-----------------------------------------------|----------------------|----------------------|----------------------|
|                                                                                        |                                    | Number of foreign corporations                | Total assets         |                      | Total receipts       |
|                                                                                        |                                    |                                               | Beginning of year    | End of year          |                      |
|                                                                                        | (1)                                | (2)                                           | (3)                  | (4)                  | (5)                  |
| <b>All geographic areas.....</b>                                                       | <b>1,079</b>                       | <b>7,500</b>                                  | <b>4,949,650,029</b> | <b>5,834,059,131</b> | <b>2,280,609,940</b> |
| <b>Canada.....</b>                                                                     | <b>377</b>                         | <b>748</b>                                    | <b>457,713,355</b>   | <b>523,801,019</b>   | <b>274,040,598</b>   |
| <b>Latin America, total.....</b>                                                       | <b>335</b>                         | <b>1,183</b>                                  | <b>625,239,201</b>   | <b>624,232,769</b>   | <b>235,452,814</b>   |
| Mexico.....                                                                            | 139                                | 293                                           | 175,364,530          | 184,437,288          | 102,334,686          |
| Central America, total.....                                                            | 28                                 | 51                                            | 9,830,669            | 11,201,912           | 4,868,012            |
| Costa Rica.....                                                                        | 5                                  | 6                                             | 967,135              | 1,073,316            | 779,984              |
| Guatemala.....                                                                         | 4                                  | 6                                             | 1,342,673            | 1,350,599            | 740,322              |
| Panama (including Canal Zone).....                                                     | 19                                 | 31                                            | 6,093,922            | 6,902,254            | 2,873,534            |
| Other Central American countries.....                                                  | 5                                  | 8                                             | 1,426,939            | 1,875,743            | 474,172              |
| Caribbean countries, total.....                                                        | 159                                | 359                                           | 260,455,144          | 299,214,709          | 45,424,007           |
| Barbados.....                                                                          | 22                                 | 29                                            | 8,189,898            | 8,013,169            | 1,174,852            |
| Cayman Islands (British).....                                                          | 140                                | 320                                           | 248,613,818          | 287,386,881          | 42,394,370           |
| Trinidad and Tobago.....                                                               | 3                                  | 4                                             | 1,097,296            | 1,226,245            | 273,788              |
| Other Caribbean countries.....                                                         | 4                                  | 6                                             | 2,554,133            | 2,588,413            | 1,580,998            |
| South America, total.....                                                              | 160                                | 480                                           | 179,588,858          | 129,378,861          | 82,826,109           |
| Argentina.....                                                                         | 71                                 | 116                                           | 27,707,003           | 12,560,451           | 11,939,159           |
| Brazil.....                                                                            | 103                                | 199                                           | 102,060,512          | 71,337,404           | 52,842,902           |
| Chile.....                                                                             | 38                                 | 64                                            | 20,480,608           | 20,189,290           | 5,293,037            |
| Colombia.....                                                                          | 15                                 | 20                                            | 6,080,287            | 5,329,969            | 3,306,534            |
| Peru.....                                                                              | 13                                 | 17                                            | 3,386,329            | 3,868,424            | 1,105,455            |
| Venezuela.....                                                                         | 28                                 | 41                                            | 16,635,494           | 13,635,597           | 6,968,791            |
| Other South American countries.....                                                    | 16                                 | 23                                            | 3,238,624            | 2,457,726            | 1,370,230            |
| <b>Other Western Hemisphere, total.....</b>                                            | <b>169</b>                         | <b>353</b>                                    | <b>292,336,369</b>   | <b>428,642,230</b>   | <b>132,940,376</b>   |
| Bahamas.....                                                                           | 26                                 | 59                                            | 40,396,728           | 43,003,236           | 18,205,138           |
| Bermuda.....                                                                           | 117                                | 214                                           | 175,616,121          | 314,226,558          | 89,153,936           |
| Netherland Antilles.....                                                               | 18                                 | 28                                            | 25,822,984           | 23,128,671           | 13,016,054           |
| Other British West Indies.....                                                         | 32                                 | 48                                            | 47,829,132           | 45,682,259           | 10,129,730           |
| <b>Europe, total.....</b>                                                              | <b>743</b>                         | <b>3,939</b>                                  | <b>2,980,752,402</b> | <b>3,613,022,977</b> | <b>1,271,321,242</b> |
| European Union, total.....                                                             | 721                                | 3,590                                         | 2,735,170,037        | 3,323,564,463        | 1,130,009,739        |
| Austria.....                                                                           | 23                                 | 31                                            | 13,071,250           | 12,429,738           | 9,708,669            |
| Belgium.....                                                                           | 78                                 | 124                                           | 61,753,825           | 66,031,291           | 28,915,544           |
| Denmark.....                                                                           | 36                                 | 51                                            | 12,006,888           | 12,332,928           | 4,540,009            |
| Finland.....                                                                           | 10                                 | 13                                            | 2,212,592            | 3,025,985            | 2,199,644            |
| France (including Andorra and Corsica).....                                            | 183                                | 370                                           | 146,758,335          | 158,620,830          | 92,603,968           |
| Germany.....                                                                           | 203                                | 438                                           | 236,530,650          | 246,875,096          | 137,681,656          |
| Greece.....                                                                            | 8                                  | 9                                             | 690,266              | 1,479,039            | 929,192              |
| Ireland.....                                                                           | 115                                | 197                                           | 136,744,517          | 161,875,794          | 52,801,938           |
| Italy (including San Marino).....                                                      | 123                                | 201                                           | 51,428,919           | 56,855,423           | 44,050,054           |
| Luxembourg.....                                                                        | 83                                 | 118                                           | 163,133,608          | 236,826,464          | 74,762,046           |
| Netherlands.....                                                                       | 292                                | 559                                           | 417,757,399          | 523,038,005          | 249,977,190          |
| Portugal.....                                                                          | 21                                 | 29                                            | 11,126,452           | 21,776,230           | 7,314,383            |
| Spain.....                                                                             | 115                                | 175                                           | 61,612,031           | 89,921,565           | 63,088,803           |
| Sweden.....                                                                            | 51                                 | 86                                            | 47,835,707           | 55,840,480           | 26,836,303           |
| United Kingdom.....                                                                    | 425                                | 1,189                                         | 1,372,507,597        | 1,676,635,595        | 334,600,338          |
| Other West European countries, total.....                                              | 141                                | 243                                           | 214,377,889          | 252,819,073          | 123,048,030          |
| Norway.....                                                                            | 23                                 | 35                                            | 7,287,079            | 11,180,217           | 5,942,151            |
| Switzerland.....                                                                       | 117                                | 185                                           | 203,067,913          | 237,022,700          | 112,938,687          |
| Turkey.....                                                                            | 15                                 | 17                                            | 2,830,149            | 3,007,567            | 3,961,668            |
| Other West European countries.....                                                     | 5                                  | 6                                             | 1,192,748            | 1,608,590            | 205,523              |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

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

[Money amounts are in thousands of dollars]

| Selected country of incorporation of the 7,500 largest Controlled Foreign Corporations | Number of U.S. corporation returns | 7,500 largest Controlled Foreign Corporations |                    |                    |                    |
|----------------------------------------------------------------------------------------|------------------------------------|-----------------------------------------------|--------------------|--------------------|--------------------|
|                                                                                        |                                    | Number of foreign corporations                | Total assets       |                    | Total receipts     |
|                                                                                        |                                    |                                               | Beginning of year  | End of year        |                    |
|                                                                                        | (1)                                | (2)                                           | (3)                | (4)                | (5)                |
| <b>Europe, total--Continued</b>                                                        |                                    |                                               |                    |                    |                    |
| East European countries, total .....                                                   | 51                                 | 106                                           | 31,204,476         | 36,639,441         | 18,263,474         |
| Czech Republic.....                                                                    | 18                                 | 22                                            | 6,848,215          | 9,019,812          | 2,879,657          |
| Hungary.....                                                                           | 24                                 | 29                                            | 6,743,751          | 8,156,541          | 5,726,935          |
| Poland.....                                                                            | 22                                 | 28                                            | 13,492,770         | 14,045,639         | 5,595,530          |
| Russia.....                                                                            | 7                                  | 11                                            | 1,475,863          | 1,904,660          | 2,621,074          |
| Slovakia.....                                                                          | 4                                  | 6                                             | 1,082,962          | 1,335,418          | 320,137            |
| Ukraine.....                                                                           | 3                                  | 3                                             | 256,318            | 349,145            | 396,947            |
| Other East European countries and former Soviet Union.....                             | 3                                  | 7                                             | 1,304,599          | 1,828,224          | 723,195            |
| <b>Africa, total.....</b>                                                              | <b>34</b>                          | <b>72</b>                                     | <b>15,714,616</b>  | <b>18,148,235</b>  | <b>13,562,950</b>  |
| North Africa, total.....                                                               | 4                                  | 8                                             | 1,171,926          | 1,048,741          | 1,302,899          |
| East Africa, total.....                                                                | 10                                 | 15                                            | 2,407,077          | 2,537,418          | 2,028,144          |
| Mauritius.....                                                                         | 6                                  | 8                                             | 1,676,037          | 1,673,523          | 1,220,934          |
| Other East African countries.....                                                      | 5                                  | 7                                             | 731,040            | 863,895            | 807,210            |
| West and Central Africa, total.....                                                    | 13                                 | 23                                            | 8,305,539          | 9,091,548          | 3,443,215          |
| Liberia.....                                                                           | 8                                  | 12                                            | 6,224,956          | 5,656,489          | 2,090,867          |
| Nigeria.....                                                                           | 4                                  | 8                                             | 1,765,471          | 2,984,796          | 896,575            |
| Other West and Central African countries.....                                          | 3                                  | 3                                             | 315,112            | 450,262            | 455,772            |
| Southern Africa, total.....                                                            | 18                                 | 26                                            | 3,830,074          | 5,470,527          | 6,788,692          |
| South Africa (including Namibia).....                                                  | 15                                 | 21                                            | 3,225,841          | 4,611,149          | 5,105,589          |
| Other Southern Africa countries.....                                                   | 4                                  | 5                                             | 604,233            | 859,379            | 1,683,103          |
| <b>Asia, total.....</b>                                                                | <b>257</b>                         | <b>827</b>                                    | <b>437,212,613</b> | <b>450,111,208</b> | <b>290,597,614</b> |
| Middle East, total.....                                                                | 28                                 | 38                                            | 11,097,315         | 11,301,326         | 5,356,508          |
| Cyprus.....                                                                            | 4                                  | 4                                             | 491,105            | 436,954            | 131,407            |
| Israel (and the West Bank).....                                                        | 20                                 | 29                                            | 9,954,027          | 10,504,884         | 5,026,077          |
| Other Middle East countries .....                                                      | 4                                  | 5                                             | 652,183            | 359,488            | 199,024            |
| Southern and Southeastern Asia, total.....                                             | 120                                | 278                                           | 100,761,035        | 110,856,733        | 79,511,144         |
| India.....                                                                             | 23                                 | 34                                            | 5,373,727          | 5,976,043          | 3,405,590          |
| Indonesia.....                                                                         | 9                                  | 13                                            | 6,265,813          | 6,919,157          | 2,967,807          |
| Malaysia.....                                                                          | 27                                 | 39                                            | 17,575,776         | 17,939,640         | 13,572,618         |
| Philippines .....                                                                      | 19                                 | 36                                            | 12,761,702         | 13,167,166         | 7,031,791          |
| Singapore.....                                                                         | 76                                 | 112                                           | 49,447,808         | 56,327,591         | 41,921,943         |
| Thailand.....                                                                          | 30                                 | 40                                            | 8,813,285          | 9,956,620          | 10,087,918         |
| Other Southern and Southeastern Asian countries.....                                   | 4                                  | 4                                             | 522,924            | 570,517            | 523,478            |
| Eastern Asia, total.....                                                               | 196                                | 511                                           | 325,354,263        | 327,953,149        | 205,729,962        |
| China.....                                                                             | 43                                 | 71                                            | 15,986,950         | 17,038,327         | 21,613,538         |
| Hong Kong.....                                                                         | 65                                 | 107                                           | 60,460,480         | 58,772,725         | 28,928,071         |
| Japan (including Okinawa and Ryukyu Islands).....                                      | 123                                | 225                                           | 206,989,938        | 203,953,894        | 117,083,517        |
| South Korea, Republic of.....                                                          | 55                                 | 66                                            | 19,328,556         | 22,244,751         | 23,943,225         |
| Taiwan.....                                                                            | 32                                 | 42                                            | 22,588,338         | 25,943,451         | 14,161,610         |
| <b>Oceania, total.....</b>                                                             | <b>126</b>                         | <b>336</b>                                    | <b>120,390,454</b> | <b>155,299,030</b> | <b>51,605,992</b>  |
| Australia.....                                                                         | 121                                | 286                                           | 99,841,199         | 126,511,080        | 45,501,525         |
| New Zealand.....                                                                       | 21                                 | 42                                            | 18,841,739         | 27,127,309         | 5,825,524          |
| Other countries of Oceania.....                                                        | 4                                  | 8                                             | 1,707,517          | 1,660,641          | 278,943            |
| <b>Puerto Rico and U.S. Possessions, total .....</b>                                   | <b>29</b>                          | <b>42</b>                                     | <b>20,291,019</b>  | <b>20,801,663</b>  | <b>11,088,354</b>  |
| Puerto Rico.....                                                                       | 25                                 | 37                                            | 18,775,105         | 19,143,961         | 10,846,188         |
| U.S. Possessions, total.....                                                           | 5                                  | 5                                             | 1,515,914          | 1,657,701          | 242,166            |
| <b>OPEC countries, total (some countries included above)</b>                           | <b>36</b>                          | <b>64</b>                                     | <b>24,834,566</b>  | <b>23,718,713</b>  | <b>10,999,704</b>  |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

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

[Money amounts are in thousands of dollars]

| Selected country of incorporation of the 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued        |                   |                                                                |                                                                                |                   |                                                 |
|----------------------------------------------------------------------------------------|-----------------------------------------------------------------|-------------------|----------------------------------------------------------------|--------------------------------------------------------------------------------|-------------------|-------------------------------------------------|
|                                                                                        | Current earnings and profits (less deficit) before income taxes | Income taxes      | Current earnings and profits (less deficit) after income taxes | Foreign corporations with current earnings and profits (+) before income taxes |                   |                                                 |
|                                                                                        |                                                                 |                   |                                                                | Current earnings and profits before income taxes                               | Income taxes      | Current earnings and profits after income taxes |
|                                                                                        | (6)                                                             | (7)               | (8)                                                            | (9)                                                                            | (10)              | (11)                                            |
| <b>All geographic areas.....</b>                                                       | <b>200,670,364</b>                                              | <b>38,610,284</b> | <b>162,060,079</b>                                             | <b>251,715,617</b>                                                             | <b>37,261,414</b> | <b>214,454,204</b>                              |
| Canada.....                                                                            | 18,204,275                                                      | 5,059,632         | 13,144,643                                                     | 22,108,050                                                                     | 5,031,041         | 17,077,009                                      |
| <b>Latin America, total.....</b>                                                       | <b>14,975,557</b>                                               | <b>4,984,271</b>  | <b>9,991,286</b>                                               | <b>25,587,623</b>                                                              | <b>4,649,782</b>  | <b>20,937,840</b>                               |
| Mexico.....                                                                            | 7,439,151                                                       | 1,883,829         | 5,555,322                                                      | 8,579,557                                                                      | 1,864,920         | 6,714,637                                       |
| Central America, total.....                                                            | 464,071                                                         | 101,074           | 362,997                                                        | 575,821                                                                        | 92,019            | 483,802                                         |
| Costa Rica.....                                                                        | 149,134                                                         | 4,435             | 144,698                                                        | 149,134                                                                        | 4,435             | 144,698                                         |
| Guatemala.....                                                                         | 2,350                                                           | 8,502             | -6,152                                                         | 4,263                                                                          | 1,435             | 2,828                                           |
| Panama (including Canal Zone).....                                                     | 268,753                                                         | 77,419            | 191,333                                                        | 378,218                                                                        | 75,431            | 302,787                                         |
| Other Central American countries.....                                                  | 43,834                                                          | 10,717            | 33,117                                                         | 44,206                                                                         | 10,717            | 33,489                                          |
| Caribbean countries, total.....                                                        | 6,152,696                                                       | 1,585,965         | 4,566,731                                                      | 8,890,500                                                                      | 1,502,778         | 7,387,722                                       |
| Barbados.....                                                                          | 322,537                                                         | 7,470             | 315,067                                                        | 330,436                                                                        | 7,148             | 323,288                                         |
| Cayman Islands (British).....                                                          | 5,316,569                                                       | 1,493,060         | 3,823,509                                                      | 8,046,474                                                                      | 1,410,195         | 6,636,279                                       |
| Trinidad and Tobago.....                                                               | 67,772                                                          | 21,435            | 46,337                                                         | 67,772                                                                         | 21,435            | 46,337                                          |
| Other Caribbean countries.....                                                         | 445,818                                                         | 64,000            | 381,818                                                        | 445,818                                                                        | 64,000            | 381,818                                         |
| South America, total.....                                                              | 919,639                                                         | 1,413,404         | -493,765                                                       | 7,541,745                                                                      | 1,190,066         | 6,351,679                                       |
| Argentina.....                                                                         | -1,500,517                                                      | 175,547           | -1,676,064                                                     | 573,450                                                                        | 161,057           | 412,392                                         |
| Brazil.....                                                                            | 1,505,562                                                       | 953,402           | 552,161                                                        | 4,869,559                                                                      | 766,850           | 4,102,709                                       |
| Chile.....                                                                             | 169,278                                                         | 48,677            | 120,601                                                        | 490,274                                                                        | 48,001            | 442,273                                         |
| Colombia.....                                                                          | 99,875                                                          | 40,123            | 59,752                                                         | 168,428                                                                        | 38,185            | 130,243                                         |
| Peru.....                                                                              | -267,286                                                        | 13,047            | -280,334                                                       | 89,316                                                                         | 12,827            | 76,489                                          |
| Venezuela.....                                                                         | 749,223                                                         | 154,938           | 594,284                                                        | 1,138,635                                                                      | 135,803           | 1,002,832                                       |
| Other South American countries.....                                                    | 163,504                                                         | 27,669            | 135,835                                                        | 212,083                                                                        | 27,343            | 184,741                                         |
| <b>Other Western Hemisphere, total.....</b>                                            | <b>16,053,168</b>                                               | <b>1,796,688</b>  | <b>14,256,481</b>                                              | <b>18,507,682</b>                                                              | <b>1,680,117</b>  | <b>16,827,565</b>                               |
| Bahamas.....                                                                           | 1,305,125                                                       | 281,243           | 1,023,882                                                      | 2,183,975                                                                      | 261,141           | 1,922,834                                       |
| Bermuda.....                                                                           | 12,442,968                                                      | 1,351,193         | 11,091,775                                                     | 13,318,268                                                                     | 1,279,794         | 12,038,473                                      |
| Netherland Antilles.....                                                               | 1,163,695                                                       | 48,821            | 1,114,874                                                      | 1,243,550                                                                      | 34,233            | 1,209,317                                       |
| Other British West Indies.....                                                         | 1,292,547                                                       | 115,431           | 1,177,117                                                      | 1,725,725                                                                      | 104,949           | 1,620,775                                       |
| <b>Europe, total.....</b>                                                              | <b>115,566,040</b>                                              | <b>19,731,978</b> | <b>95,834,062</b>                                              | <b>144,592,702</b>                                                             | <b>19,033,856</b> | <b>125,558,846</b>                              |
| European Union, total.....                                                             | 98,573,292                                                      | 17,989,102        | 80,584,191                                                     | 126,347,928                                                                    | 17,309,718        | 109,038,210                                     |
| Austria.....                                                                           | 887,514                                                         | 170,107           | 717,407                                                        | 981,825                                                                        | 169,711           | 812,113                                         |
| Belgium.....                                                                           | 2,841,838                                                       | 408,423           | 2,433,414                                                      | 3,358,646                                                                      | 305,995           | 3,052,651                                       |
| Denmark.....                                                                           | 9,494                                                           | 62,242            | -52,747                                                        | 276,690                                                                        | 60,501            | 216,189                                         |
| Finland.....                                                                           | 163,840                                                         | 46,948            | 116,892                                                        | 172,336                                                                        | 46,948            | 125,388                                         |
| France (including Andorra and Corsica).....                                            | 5,720,686                                                       | 1,320,288         | 4,400,398                                                      | 7,474,614                                                                      | 1,304,471         | 6,170,143                                       |
| Germany.....                                                                           | 6,427,139                                                       | 1,802,957         | 4,624,183                                                      | 9,200,225                                                                      | 1,724,991         | 7,475,234                                       |
| Greece.....                                                                            | 93,968                                                          | 39,086            | 54,882                                                         | 97,130                                                                         | 39,086            | 58,044                                          |
| Ireland.....                                                                           | 14,681,537                                                      | 791,968           | 13,889,569                                                     | 15,476,381                                                                     | 743,842           | 14,732,540                                      |
| Italy (including San Marino).....                                                      | 3,891,996                                                       | 1,181,592         | 2,710,404                                                      | 4,493,494                                                                      | 1,154,362         | 3,339,131                                       |
| Luxembourg.....                                                                        | 5,084,975                                                       | 377,167           | 4,707,808                                                      | 5,590,304                                                                      | 375,522           | 5,214,783                                       |
| Netherlands.....                                                                       | 32,587,033                                                      | 5,196,951         | 27,390,082                                                     | 35,875,543                                                                     | 5,100,726         | 30,774,818                                      |
| Portugal.....                                                                          | 895,083                                                         | 148,501           | 746,582                                                        | 954,449                                                                        | 136,998           | 817,451                                         |
| Spain.....                                                                             | 3,619,873                                                       | 1,388,715         | 2,231,157                                                      | 4,392,328                                                                      | 1,391,406         | 3,000,922                                       |
| Sweden.....                                                                            | 994,089                                                         | 249,963           | 744,126                                                        | 2,156,854                                                                      | 246,596           | 1,910,258                                       |
| United Kingdom.....                                                                    | 20,674,228                                                      | 4,804,193         | 15,870,035                                                     | 35,847,110                                                                     | 4,508,563         | 31,338,547                                      |
| Other West European countries, total.....                                              | 15,144,918                                                      | 1,352,766         | 13,792,152                                                     | 16,275,208                                                                     | 1,336,565         | 14,938,643                                      |
| Norway.....                                                                            | 552,623                                                         | 273,855           | 278,768                                                        | 654,218                                                                        | 271,797           | 382,420                                         |
| Switzerland.....                                                                       | 14,455,517                                                      | 1,017,479         | 13,438,039                                                     | 15,347,699                                                                     | 1,004,017         | 14,343,682                                      |
| Turkey.....                                                                            | 115,939                                                         | 60,968            | 54,971                                                         | 251,957                                                                        | 60,650            | 191,307                                         |
| Other West European countries.....                                                     | 20,839                                                          | 465               | 20,374                                                         | 21,334                                                                         | 100               | 21,233                                          |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

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

[Money amounts are in thousands of dollars]

| Selected country of incorporation of the 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued        |                  |                                                                |                                                                                |                  |                                                 |
|----------------------------------------------------------------------------------------|-----------------------------------------------------------------|------------------|----------------------------------------------------------------|--------------------------------------------------------------------------------|------------------|-------------------------------------------------|
|                                                                                        | Current earnings and profits (less deficit) before income taxes | Income taxes     | Current earnings and profits (less deficit) after income taxes | Foreign corporations with current earnings and profits (+) before income taxes |                  |                                                 |
|                                                                                        |                                                                 |                  |                                                                | Current earnings and profits before income taxes                               | Income taxes     | Current earnings and profits after income taxes |
|                                                                                        | (6)                                                             | (7)              | (8)                                                            | (9)                                                                            | (10)             | (11)                                            |
| <b>Europe, total--Continued</b>                                                        |                                                                 |                  |                                                                |                                                                                |                  |                                                 |
| East European countries, total .....                                                   | 1,847,830                                                       | 390,110          | 1,457,719                                                      | 1,969,567                                                                      | 387,573          | 1,581,993                                       |
| Czech Republic.....                                                                    | 411,098                                                         | 112,789          | 298,309                                                        | 457,798                                                                        | 112,789          | 345,009                                         |
| Hungary.....                                                                           | 498,648                                                         | 43,323           | 455,325                                                        | 506,941                                                                        | 41,982           | 464,959                                         |
| Poland.....                                                                            | 443,133                                                         | 148,553          | 294,580                                                        | 475,156                                                                        | 147,357          | 327,799                                         |
| Russia.....                                                                            | 363,223                                                         | 44,950           | 318,273                                                        | 377,507                                                                        | 44,950           | 332,557                                         |
| Slovakia.....                                                                          | 47,501                                                          | 12,605           | 34,896                                                         | 52,485                                                                         | 12,605           | 39,879                                          |
| Ukraine.....                                                                           | 44,032                                                          | 15,448           | 28,584                                                         | 44,032                                                                         | 15,448           | 28,584                                          |
| Other East European countries and former Soviet Union.....                             | 40,195                                                          | 12,443           | 27,752                                                         | 55,648                                                                         | 12,443           | 43,205                                          |
| <b>Africa, total.....</b>                                                              | <b>1,343,428</b>                                                | <b>264,292</b>   | <b>1,079,136</b>                                               | <b>1,561,687</b>                                                               | <b>255,590</b>   | <b>1,306,097</b>                                |
| North Africa, total.....                                                               | -3,818                                                          | 9,140            | -12,958                                                        | 49,577                                                                         | 9,140            | 40,437                                          |
| East Africa, total.....                                                                | 187,082                                                         | 16,021           | 171,061                                                        | 187,082                                                                        | 16,021           | 171,061                                         |
| Mauritius.....                                                                         | 130,765                                                         | 8,033            | 122,732                                                        | 130,765                                                                        | 8,033            | 122,732                                         |
| Other East African countries.....                                                      | 56,316                                                          | 7,988            | 48,329                                                         | 56,316                                                                         | 7,988            | 48,329                                          |
| West and Central Africa, total.....                                                    | 566,073                                                         | 70,783           | 495,290                                                        | 671,644                                                                        | 68,750           | 602,894                                         |
| Liberia.....                                                                           | 427,370                                                         | 27,253           | 400,117                                                        | 466,385                                                                        | 26,722           | 439,663                                         |
| Nigeria.....                                                                           | 121,916                                                         | 41,977           | 79,938                                                         | 185,855                                                                        | 41,977           | 143,877                                         |
| Other West and Central African countries.....                                          | 16,787                                                          | 1,552            | 15,234                                                         | 19,404                                                                         | 51               | 19,353                                          |
| Southern Africa, total.....                                                            | 594,092                                                         | 168,349          | 425,743                                                        | 653,384                                                                        | 161,679          | 491,705                                         |
| South Africa (including Namibia).....                                                  | 424,707                                                         | 109,292          | 315,415                                                        | 431,650                                                                        | 109,289          | 322,361                                         |
| Other Southern Africa countries.....                                                   | 169,385                                                         | 59,057           | 110,328                                                        | 221,734                                                                        | 52,390           | 169,344                                         |
| <b>Asia, total.....</b>                                                                | <b>27,565,108</b>                                               | <b>5,563,592</b> | <b>22,001,516</b>                                              | <b>30,993,812</b>                                                              | <b>5,401,908</b> | <b>25,591,904</b>                               |
| Middle East, total.....                                                                | 682,359                                                         | 77,006           | 605,353                                                        | 1,073,452                                                                      | 74,970           | 998,482                                         |
| Cyprus.....                                                                            | 37,193                                                          | 4,087            | 33,106                                                         | 91,227                                                                         | 4,087            | 87,140                                          |
| Israel (and the West Bank).....                                                        | 608,986                                                         | 72,916           | 536,071                                                        | 944,793                                                                        | 70,883           | 873,910                                         |
| Other Middle East countries .....                                                      | 36,179                                                          | 3                | 36,176                                                         | 37,432                                                                         | --               | 37,432                                          |
| Southern and Southeastern Asia, total.....                                             | 5,999,182                                                       | 946,637          | 5,052,545                                                      | 6,924,385                                                                      | 915,042          | 6,009,343                                       |
| India.....                                                                             | 167,901                                                         | 96,118           | 71,783                                                         | 377,681                                                                        | 91,633           | 286,049                                         |
| Indonesia.....                                                                         | 803,691                                                         | 288,531          | 515,160                                                        | 813,171                                                                        | 288,531          | 524,640                                         |
| Malaysia.....                                                                          | 1,230,857                                                       | 80,421           | 1,150,436                                                      | 1,271,481                                                                      | 71,621           | 1,199,860                                       |
| Philippines .....                                                                      | 898,411                                                         | 111,396          | 787,015                                                        | 934,625                                                                        | 109,977          | 824,648                                         |
| Singapore.....                                                                         | 2,352,902                                                       | 260,785          | 2,092,117                                                      | 2,851,607                                                                      | 244,610          | 2,606,996                                       |
| Thailand.....                                                                          | 495,533                                                         | 109,001          | 386,532                                                        | 625,909                                                                        | 108,289          | 517,619                                         |
| Other Southern and Southeastern Asian countries.....                                   | 49,887                                                          | 385              | 49,502                                                         | 49,911                                                                         | 381              | 49,531                                          |
| Eastern Asia, total.....                                                               | 20,883,567                                                      | 4,539,949        | 16,343,618                                                     | 22,995,975                                                                     | 4,411,897        | 18,584,078                                      |
| China.....                                                                             | 2,133,080                                                       | 188,070          | 1,945,011                                                      | 2,198,397                                                                      | 186,587          | 2,011,810                                       |
| Hong Kong.....                                                                         | 3,470,610                                                       | 434,578          | 3,036,032                                                      | 3,960,413                                                                      | 431,951          | 3,528,462                                       |
| Japan (including Okinawa and Ryukyu Islands).....                                      | 12,143,026                                                      | 3,148,301        | 8,994,725                                                      | 13,522,315                                                                     | 3,028,362        | 10,493,953                                      |
| South Korea, Republic of.....                                                          | 2,004,694                                                       | 581,755          | 1,422,939                                                      | 2,063,245                                                                      | 580,986          | 1,482,258                                       |
| Taiwan.....                                                                            | 1,132,156                                                       | 187,246          | 944,911                                                        | 1,251,605                                                                      | 184,010          | 1,067,596                                       |
| <b>Oceania, total.....</b>                                                             | <b>4,714,865</b>                                                | <b>1,055,156</b> | <b>3,659,709</b>                                               | <b>6,080,515</b>                                                               | <b>1,052,598</b> | <b>5,027,917</b>                                |
| Australia.....                                                                         | 4,069,092                                                       | 950,709          | 3,118,383                                                      | 5,220,798                                                                      | 945,822          | 4,274,976                                       |
| New Zealand.....                                                                       | 612,218                                                         | 94,280           | 517,938                                                        | 800,477                                                                        | 98,737           | 701,740                                         |
| Other countries of Oceania.....                                                        | 33,555                                                          | 10,167           | 23,388                                                         | 59,240                                                                         | 8,038            | 51,202                                          |
| <b>Puerto Rico and U.S. Possessions, total .....</b>                                   | <b>2,247,922</b>                                                | <b>154,675</b>   | <b>2,093,247</b>                                               | <b>2,283,548</b>                                                               | <b>156,522</b>   | <b>2,127,025</b>                                |
| Puerto Rico.....                                                                       | 2,251,312                                                       | 153,289          | 2,098,023                                                      | 2,260,572                                                                      | 153,263          | 2,107,309                                       |
| U.S. Possessions, total.....                                                           | -3,389                                                          | 1,387            | -4,776                                                         | 22,976                                                                         | 3,259            | 19,717                                          |
| <b>OPEC countries, total (some countries included above)</b>                           | <b>1,710,127</b>                                                | <b>485,447</b>   | <b>1,224,680</b>                                               | <b>2,172,957</b>                                                               | <b>466,311</b>   | <b>1,706,647</b>                                |

Footnotes at end of table.



# Controlled Foreign Corporations, 2002

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

[Money amounts are in thousands of dollars]

| Selected country of incorporation of the 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued |                                           |                                       |                                                |                        |
|----------------------------------------------------------------------------------------|----------------------------------------------------------|-------------------------------------------|---------------------------------------|------------------------------------------------|------------------------|
|                                                                                        | Distributions out of earnings and profits                |                                           |                                       | Dividends paid to controlling U.S. corporation | Total Subpart F income |
|                                                                                        | Total                                                    | Not previously taxed earnings and profits | Previously taxed earnings and profits |                                                |                        |
|                                                                                        | (12)                                                     | (13)                                      | (14)                                  | (15)                                           | (16)                   |
| <b>All geographic areas.....</b>                                                       | <b>97,011,345</b>                                        | <b>58,556,699</b>                         | <b>38,454,646</b>                     | <b>27,045,099</b>                              | <b>31,420,940</b>      |
| <b>Canada.....</b>                                                                     | <b>8,144,729</b>                                         | <b>5,272,242</b>                          | <b>2,872,487</b>                      | <b>3,941,111</b>                               | <b>2,122,812</b>       |
| <b>Latin America, total.....</b>                                                       | <b>9,273,252</b>                                         | <b>5,484,065</b>                          | <b>3,789,187</b>                      | <b>2,737,908</b>                               | <b>2,923,125</b>       |
| Mexico.....                                                                            | 1,688,222                                                | 1,319,656                                 | 368,566                               | 583,238                                        | 539,006                |
| Central America, total.....                                                            | 372,012                                                  | 95,975                                    | 276,037                               | 3,527                                          | 87,752                 |
| Costa Rica .....                                                                       | 4,291                                                    | 6                                         | 4,284                                 | 6                                              | 8,725                  |
| Guatemala .....                                                                        | 4,956                                                    | 3,504                                     | 1,452                                 | 3,521                                          | 1,289                  |
| Panama (including Canal Zone) .....                                                    | 336,920                                                  | 70,031                                    | 266,890                               | --                                             | 75,896                 |
| Other Central American countries.....                                                  | 25,846                                                   | 22,434                                    | 3,411                                 | --                                             | 1,842                  |
| Caribbean countries, total.....                                                        | 3,205,100                                                | 1,315,119                                 | 1,889,981                             | 610,910                                        | 1,802,628              |
| Barbados.....                                                                          | 203,910                                                  | 77,504                                    | 126,406                               | 77,503                                         | 100,815                |
| Cayman Islands (British).....                                                          | 2,752,978                                                | 1,005,625                                 | 1,747,353                             | 308,760                                        | 1,692,970              |
| Trinidad and Tobago.....                                                               | 36,917                                                   | 27,655                                    | 9,262                                 | 20,312                                         | 789                    |
| Other Caribbean countries.....                                                         | 211,295                                                  | 204,334                                   | 6,961                                 | 204,334                                        | 8,054                  |
| South America, total.....                                                              | 4,007,918                                                | 2,753,316                                 | 1,254,602                             | 1,540,233                                      | 493,738                |
| Argentina.....                                                                         | 35,830                                                   | 34,833                                    | 997                                   | 25,753                                         | 21,833                 |
| Brazil.....                                                                            | 2,520,784                                                | 1,793,725                                 | 727,059                               | 1,273,325                                      | 358,579                |
| Chile.....                                                                             | 631,067                                                  | 228,020                                   | 403,047                               | 144,915                                        | 80,468                 |
| Colombia.....                                                                          | 77,699                                                   | 23,707                                    | 53,992                                | 13,061                                         | 7,620                  |
| Peru.....                                                                              | 50,364                                                   | 45,829                                    | 4,535                                 | --                                             | 1,497                  |
| Venezuela.....                                                                         | 634,344                                                  | 582,347                                   | 51,997                                | 75,362                                         | 15,032                 |
| Other South American countries.....                                                    | 57,831                                                   | 44,855                                    | 12,976                                | 7,818                                          | 8,709                  |
| <b>Other Western Hemisphere, total.....</b>                                            | <b>7,358,223</b>                                         | <b>2,304,973</b>                          | <b>5,053,250</b>                      | <b>1,347,556</b>                               | <b>4,093,324</b>       |
| Bahamas.....                                                                           | 1,223,024                                                | 701,691                                   | 521,332                               | 521,025                                        | 130,441                |
| Bermuda .....                                                                          | 5,250,898                                                | 1,503,622                                 | 3,747,276                             | 744,163                                        | 3,293,727              |
| Netherland Antilles.....                                                               | 384,477                                                  | 72,149                                    | 312,328                               | 69,363                                         | 118,115                |
| Other British West Indies.....                                                         | 474,324                                                  | 27,511                                    | 446,813                               | 13,006                                         | 540,376                |
| <b>Europe, total.....</b>                                                              | <b>54,708,798</b>                                        | <b>31,630,928</b>                         | <b>23,077,870</b>                     | <b>11,486,543</b>                              | <b>18,188,552</b>      |
| European Union, total .....                                                            | 48,395,918                                               | 29,310,880                                | 19,085,038                            | 10,048,887                                     | 15,778,476             |
| Austria.....                                                                           | 854,683                                                  | 390,793                                   | 463,891                               | 352,920                                        | 575,105                |
| Belgium.....                                                                           | 719,762                                                  | 432,497                                   | 287,264                               | 222,619                                        | 1,717,959              |
| Denmark.....                                                                           | 245,098                                                  | 192,471                                   | 52,627                                | 17,475                                         | 55,905                 |
| Finland.....                                                                           | 11,160                                                   | 7,659                                     | 3,501                                 | --                                             | 8,756                  |
| France (including Andorra and Corsica).....                                            | 2,865,644                                                | 2,459,089                                 | 406,555                               | 734,608                                        | 633,858                |
| Germany.....                                                                           | 3,662,523                                                | 2,115,158                                 | 1,547,365                             | 660,630                                        | 615,815                |
| Greece.....                                                                            | 23,562                                                   | 20,603                                    | 2,959                                 | 13,058                                         | 15,881                 |
| Ireland.....                                                                           | 4,932,475                                                | 2,480,542                                 | 2,451,933                             | 659,405                                        | 1,842,006              |
| Italy (including San Marino).....                                                      | 1,866,238                                                | 1,718,520                                 | 147,718                               | 329,740                                        | 538,723                |
| Luxembourg .....                                                                       | 3,940,717                                                | 1,327,627                                 | 2,613,090                             | 1,293,224                                      | 1,172,756              |
| Netherlands.....                                                                       | 10,433,285                                               | 5,198,891                                 | 5,234,394                             | 1,404,933                                      | 3,098,938              |
| Portugal.....                                                                          | 97,903                                                   | 42,174                                    | 55,729                                | --                                             | 434,333                |
| Spain.....                                                                             | 2,097,871                                                | 1,178,796                                 | 919,075                               | 765,841                                        | 583,313                |
| Sweden.....                                                                            | 1,032,679                                                | 213,607                                   | 819,071                               | 109,970                                        | 729,914                |
| United Kingdom.....                                                                    | 15,612,317                                               | 11,532,452                                | 4,079,865                             | 3,484,464                                      | 3,755,212              |
| Other West European countries, total.....                                              | 5,798,028                                                | 1,905,174                                 | 3,892,854                             | 1,306,196                                      | 2,215,787              |
| Norway.....                                                                            | 152,095                                                  | 144,673                                   | 7,422                                 | 113,534                                        | 43,073                 |
| Switzerland.....                                                                       | 5,562,265                                                | 1,708,495                                 | 3,853,771                             | 1,184,452                                      | 2,135,910              |
| Turkey.....                                                                            | 74,860                                                   | 52,007                                    | 22,853                                | 8,210                                          | 28,508                 |
| Other West European countries.....                                                     | 8,808                                                    | --                                        | 8,808                                 | --                                             | 8,295                  |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

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

[Money amounts are in thousands of dollars]

| Selected country of incorporation of the 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued |                                           |                                       |                                                |                        |
|----------------------------------------------------------------------------------------|----------------------------------------------------------|-------------------------------------------|---------------------------------------|------------------------------------------------|------------------------|
|                                                                                        | Distributions out of earnings and profits                |                                           |                                       | Dividends paid to controlling U.S. corporation | Total Subpart F income |
|                                                                                        | Total                                                    | Not previously taxed earnings and profits | Previously taxed earnings and profits |                                                |                        |
|                                                                                        | (12)                                                     | (13)                                      | (14)                                  | (15)                                           | (16)                   |
| <b>Europe, total--Continued</b>                                                        |                                                          |                                           |                                       |                                                |                        |
| East European countries, total .....                                                   | 514,852                                                  | 414,874                                   | 99,978                                | 131,460                                        | 194,289                |
| Czech Republic.....                                                                    | 106,253                                                  | 102,132                                   | 4,121                                 | 1,321                                          | 102,156                |
| Hungary.....                                                                           | 154,880                                                  | 103,891                                   | 50,989                                | 72,645                                         | 86,210                 |
| Poland.....                                                                            | 87,931                                                   | 43,064                                    | 44,868                                | 41,285                                         | 5,669                  |
| Russia.....                                                                            | 117,631                                                  | 117,631                                   | --                                    | --                                             | 253                    |
| Slovakia.....                                                                          | 13,626                                                   | 13,626                                    | --                                    | 14,744                                         | --                     |
| Ukraine.....                                                                           | 19,313                                                   | 19,313                                    | --                                    | 1,465                                          | --                     |
| Other East European countries and former Soviet Union.....                             | 15,219                                                   | 15,219                                    | --                                    | --                                             | --                     |
| <b>Africa, total.....</b>                                                              | <b>426,415</b>                                           | <b>279,966</b>                            | <b>146,449</b>                        | <b>228,232</b>                                 | <b>182,944</b>         |
| North Africa, total.....                                                               | 21,451                                                   | 21,451                                    | --                                    | 4                                              | --                     |
| East Africa, total.....                                                                | 64,883                                                   | 63,052                                    | 1,832                                 | 61,109                                         | 9,043                  |
| Mauritius.....                                                                         | 10,000                                                   | 10,000                                    | --                                    | 10,000                                         | 7,938                  |
| Other East African countries.....                                                      | 54,883                                                   | 53,052                                    | 1,832                                 | 51,109                                         | 1,105                  |
| West and Central Africa, total.....                                                    | 197,556                                                  | 125,588                                   | 71,968                                | 113,411                                        | 152,684                |
| Liberia.....                                                                           | 92,673                                                   | 22,673                                    | 70,000                                | 22,673                                         | 136,888                |
| Nigeria.....                                                                           | 104,884                                                  | 102,916                                   | 1,968                                 | 90,738                                         | --                     |
| Other West and Central African countries.....                                          | --                                                       | --                                        | --                                    | --                                             | 15,796                 |
| Southern Africa, total.....                                                            | 142,524                                                  | 69,875                                    | 72,649                                | 53,709                                         | 21,217                 |
| South Africa (including Namibia).....                                                  | 136,163                                                  | 63,514                                    | 72,649                                | 53,709                                         | 19,053                 |
| Other Southern Africa countries.....                                                   | 6,361                                                    | 6,361                                     | --                                    | --                                             | 2,165                  |
| <b>Asia, total.....</b>                                                                | <b>14,562,125</b>                                        | <b>11,592,943</b>                         | <b>2,969,183</b>                      | <b>6,537,441</b>                               | <b>3,169,976</b>       |
| Middle East, total.....                                                                | 239,313                                                  | 162,556                                   | 76,757                                | 15,778                                         | 59,963                 |
| Cyprus.....                                                                            | 93,454                                                   | 48,289                                    | 45,165                                | 2,185                                          | 31,835                 |
| Israel (and the West Bank).....                                                        | 125,785                                                  | 94,193                                    | 31,592                                | 11,010                                         | 28,128                 |
| Other Middle East countries .....                                                      | 20,073                                                   | 20,073                                    | --                                    | 2,583                                          | --                     |
| Southern and Southeastern Asia, total.....                                             | 4,810,933                                                | 4,073,593                                 | 737,340                               | 2,463,503                                      | 1,478,433              |
| India.....                                                                             | 51,765                                                   | 43,953                                    | 7,811                                 | 26,440                                         | 6,585                  |
| Indonesia.....                                                                         | 439,563                                                  | 428,573                                   | 10,990                                | 20,939                                         | 3,117                  |
| Malaysia.....                                                                          | 1,463,171                                                | 1,324,795                                 | 138,376                               | 1,076,402                                      | 314,160                |
| Philippines .....                                                                      | 284,660                                                  | 252,374                                   | 32,286                                | 54,235                                         | 31,627                 |
| Singapore.....                                                                         | 2,518,016                                                | 1,972,770                                 | 545,245                               | 1,253,685                                      | 1,100,222              |
| Thailand.....                                                                          | 44,585                                                   | 44,585                                    | --                                    | 31,802                                         | 18,543                 |
| Other Southern and Southeastern Asian countries.....                                   | 9,174                                                    | 6,543                                     | 2,631                                 | --                                             | 4,179                  |
| Eastern Asia, total.....                                                               | 9,511,879                                                | 7,356,794                                 | 2,155,085                             | 4,058,160                                      | 1,631,580              |
| China.....                                                                             | 1,483,752                                                | 1,187,862                                 | 295,890                               | 557,254                                        | 278,232                |
| Hong Kong.....                                                                         | 2,068,512                                                | 1,171,827                                 | 896,685                               | 497,855                                        | 617,222                |
| Japan (including Okinawa and Ryukyu Islands).....                                      | 4,961,046                                                | 4,096,370                                 | 864,676                               | 2,403,647                                      | 625,626                |
| South Korea, Republic of.....                                                          | 570,638                                                  | 483,421                                   | 87,217                                | 364,355                                        | 104,194                |
| Taiwan.....                                                                            | 427,932                                                  | 417,314                                   | 10,618                                | 235,049                                        | 6,306                  |
| <b>Oceania, total.....</b>                                                             | <b>2,373,903</b>                                         | <b>1,843,160</b>                          | <b>530,743</b>                        | <b>720,004</b>                                 | <b>703,203</b>         |
| Australia.....                                                                         | 1,929,464                                                | 1,615,726                                 | 313,737                               | 713,208                                        | 426,921                |
| New Zealand.....                                                                       | 276,983                                                  | 213,834                                   | 63,150                                | 6,796                                          | 254,655                |
| Other countries of Oceania.....                                                        | 167,456                                                  | 13,600                                    | 153,856                               | --                                             | 21,627                 |
| <b>Puerto Rico and U.S. Possessions, total .....</b>                                   | <b>163,900</b>                                           | <b>148,422</b>                            | <b>15,479</b>                         | <b>46,303</b>                                  | <b>37,003</b>          |
| Puerto Rico.....                                                                       | 163,801                                                  | 148,422                                   | 15,380                                | 46,303                                         | 35,976                 |
| U.S. Possessions, total.....                                                           | 99                                                       | --                                        | 99                                    | --                                             | 1,027                  |
| <b>OPEC countries, total (some countries included above).....</b>                      | <b>1,193,698</b>                                         | <b>1,128,743</b>                          | <b>64,956</b>                         | <b>187,039</b>                                 | <b>18,148</b>          |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

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

[Money amounts are in thousands of dollars]

| Selected country of incorporation of the 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued |                            |                                |                                                                    |                                                                       |                           |                      |
|----------------------------------------------------------------------------------------|----------------------------------------------------------|----------------------------|--------------------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------|---------------------------|----------------------|
|                                                                                        | Receipts by foreign corporations from                    |                            |                                |                                                                    |                                                                       |                           |                      |
|                                                                                        | All sources                                              | All related parties, total | U.S. corporation filing return | Domestic corporations controlled by U.S. corporation filing return | Any foreign corporations controlled by U.S. corporation filing return | All other related parties | Unrelated parties    |
|                                                                                        | (17)                                                     | (18)                       | (19)                           | (20)                                                               | (21)                                                                  | (22)                      | (23)                 |
| <b>All geographic areas.....</b>                                                       | <b>2,280,609,940</b>                                     | <b>672,144,486</b>         | <b>134,511,735</b>             | <b>108,868,037</b>                                                 | <b>428,540,307</b>                                                    | <b>224,408</b>            | <b>1,629,260,926</b> |
| Canada.....                                                                            | 274,040,598                                              | 59,204,944                 | 21,848,276                     | 22,823,841                                                         | 14,531,807                                                            | 1,020                     | 215,487,542          |
| <b>Latin America, total.....</b>                                                       | <b>235,452,814</b>                                       | <b>52,199,948</b>          | <b>11,385,064</b>              | <b>14,203,042</b>                                                  | <b>26,474,951</b>                                                     | <b>136,890</b>            | <b>185,834,162</b>   |
| Mexico.....                                                                            | 102,334,686                                              | 22,516,059                 | 4,636,019                      | 9,833,525                                                          | 8,046,516                                                             | --                        | 80,678,875           |
| Central America, total.....                                                            | 4,868,012                                                | 1,897,762                  | 395,971                        | 601,283                                                            | 900,508                                                               | --                        | 2,971,333            |
| Costa Rica .....                                                                       | 779,984                                                  | 624,237                    | 388,575                        | 189,503                                                            | 46,159                                                                | --                        | 155,747              |
| Guatemala .....                                                                        | 740,322                                                  | 165,320                    | --                             | 3,920                                                              | 161,400                                                               | --                        | 575,001              |
| Panama (including Canal Zone) .....                                                    | 2,873,534                                                | 1,007,612                  | 7,396                          | 374,746                                                            | 625,470                                                               | --                        | 1,867,006            |
| Other Central American countries.....                                                  | 474,172                                                  | 100,593                    | --                             | 33,113                                                             | 67,480                                                                | --                        | 373,579              |
| Caribbean countries, total.....                                                        | 45,424,007                                               | 12,879,981                 | 4,110,234                      | 2,064,147                                                          | 6,705,600                                                             | --                        | 33,752,803           |
| Barbados.....                                                                          | 1,174,852                                                | 759,948                    | 243,406                        | 64,244                                                             | 452,299                                                               | --                        | 414,988              |
| Cayman Islands (British).....                                                          | 42,394,370                                               | 11,941,455                 | 3,866,828                      | 1,840,856                                                          | 6,233,771                                                             | --                        | 31,658,329           |
| Trinidad and Tobago.....                                                               | 273,788                                                  | 177,400                    | --                             | 159,048                                                            | 18,352                                                                | --                        | 99,666               |
| Other Caribbean countries.....                                                         | 1,580,998                                                | 1,178                      | --                             | --                                                                 | 1,178                                                                 | --                        | 1,579,820            |
| South America, total.....                                                              | 82,826,109                                               | 14,906,146                 | 2,242,840                      | 1,704,087                                                          | 10,822,328                                                            | 136,890                   | 68,431,150           |
| Argentina.....                                                                         | 11,939,159                                               | 2,433,458                  | 95,344                         | 44,732                                                             | 2,285,981                                                             | 7,401                     | 9,505,805            |
| Brazil.....                                                                            | 52,842,902                                               | 9,691,437                  | 1,455,610                      | 1,148,144                                                          | 6,958,193                                                             | 129,489                   | 43,647,216           |
| Chile.....                                                                             | 5,293,037                                                | 1,024,860                  | 104,864                        | 346,467                                                            | 573,529                                                               | --                        | 4,275,285            |
| Colombia.....                                                                          | 3,306,534                                                | 407,591                    | 16,096                         | 31,260                                                             | 360,235                                                               | --                        | 2,899,312            |
| Peru.....                                                                              | 1,105,455                                                | 160,431                    | 12,408                         | 99,778                                                             | 48,245                                                                | --                        | 945,024              |
| Venezuela.....                                                                         | 6,968,791                                                | 843,172                    | 558,502                        | 15,066                                                             | 269,604                                                               | --                        | 6,133,476            |
| Other South American countries.....                                                    | 1,370,230                                                | 345,197                    | 16                             | 18,641                                                             | 326,540                                                               | --                        | 1,025,033            |
| <b>Other Western Hemisphere, total.....</b>                                            | <b>132,940,376</b>                                       | <b>60,307,441</b>          | <b>25,575,337</b>              | <b>13,503,479</b>                                                  | <b>21,228,625</b>                                                     | <b>--</b>                 | <b>73,254,180</b>    |
| Bahamas.....                                                                           | 18,205,138                                               | 6,814,349                  | 143,560                        | 649,783                                                            | 6,021,006                                                             | --                        | 11,390,831           |
| Bermuda .....                                                                          | 89,153,936                                               | 38,736,184                 | 18,969,713                     | 11,053,236                                                         | 8,713,235                                                             | --                        | 50,769,515           |
| Netherland Antilles.....                                                               | 13,016,054                                               | 8,371,643                  | 3,304,421                      | 33,391                                                             | 5,033,831                                                             | --                        | 4,898,222            |
| Other British West Indies.....                                                         | 10,129,730                                               | 4,916,305                  | 3,157,644                      | 579,621                                                            | 1,179,041                                                             | --                        | 5,229,054            |
| <b>Europe, total.....</b>                                                              | <b>1,271,321,242</b>                                     | <b>394,433,312</b>         | <b>48,666,060</b>              | <b>43,700,977</b>                                                  | <b>302,063,929</b>                                                    | <b>2,345</b>              | <b>891,097,505</b>   |
| European Union, total .....                                                            | 1,130,009,739                                            | 343,493,134                | 42,586,250                     | 39,788,453                                                         | 261,116,086                                                           | 2,345                     | 797,279,104          |
| Austria.....                                                                           | 9,708,669                                                | 4,921,863                  | 26,800                         | 2,440,250                                                          | 2,454,813                                                             | --                        | 5,052,331            |
| Belgium.....                                                                           | 28,915,544                                               | 12,382,600                 | 713,183                        | 918,614                                                            | 10,750,803                                                            | --                        | 16,625,163           |
| Denmark.....                                                                           | 4,540,009                                                | 1,110,268                  | 117,061                        | 49,123                                                             | 944,084                                                               | --                        | 3,448,540            |
| Finland.....                                                                           | 2,199,644                                                | 132,835                    | 8,756                          | 1,534                                                              | 122,544                                                               | --                        | 2,066,810            |
| France (including Andorra and Corsica).....                                            | 92,603,968                                               | 28,558,292                 | 2,092,335                      | 1,729,859                                                          | 24,736,097                                                            | --                        | 64,429,994           |
| Germany.....                                                                           | 137,681,656                                              | 46,123,787                 | 3,549,893                      | 1,750,132                                                          | 40,823,762                                                            | --                        | 92,617,840           |
| Greece.....                                                                            | 929,192                                                  | 39,354                     | --                             | --                                                                 | 39,354                                                                | --                        | 889,838              |
| Ireland.....                                                                           | 52,801,938                                               | 17,454,859                 | 4,425,215                      | 2,189,602                                                          | 10,840,042                                                            | --                        | 36,243,944           |
| Italy (including San Marino).....                                                      | 44,050,054                                               | 6,913,098                  | 833,121                        | 545,813                                                            | 5,534,163                                                             | --                        | 37,424,915           |
| Luxembourg .....                                                                       | 74,762,046                                               | 9,945,844                  | 870,846                        | 1,437,415                                                          | 7,637,583                                                             | --                        | 64,938,183           |
| Netherlands.....                                                                       | 249,977,190                                              | 101,922,596                | 13,539,569                     | 15,072,111                                                         | 73,310,915                                                            | --                        | 148,948,397          |
| Portugal.....                                                                          | 7,314,383                                                | 984,916                    | 34,585                         | 39,289                                                             | 911,043                                                               | --                        | 6,329,467            |
| Spain.....                                                                             | 63,088,803                                               | 11,686,454                 | 681,824                        | 346,273                                                            | 10,658,358                                                            | --                        | 51,582,646           |
| Sweden.....                                                                            | 26,836,303                                               | 14,307,332                 | 3,617,805                      | 407,609                                                            | 10,281,919                                                            | --                        | 12,563,526           |
| United Kingdom.....                                                                    | 334,600,338                                              | 87,009,037                 | 12,075,256                     | 12,860,828                                                         | 62,070,607                                                            | 2,345                     | 254,117,510          |
| Other West European countries, total.....                                              | 123,048,030                                              | 46,613,895                 | 5,800,306                      | 3,665,788                                                          | 37,147,802                                                            | --                        | 79,666,157           |
| Norway.....                                                                            | 5,942,151                                                | 906,440                    | 30,485                         | 39,070                                                             | 836,884                                                               | --                        | 5,071,925            |
| Switzerland.....                                                                       | 112,938,687                                              | 43,947,803                 | 5,748,401                      | 3,623,546                                                          | 34,575,855                                                            | --                        | 72,186,694           |
| Turkey.....                                                                            | 3,961,668                                                | 1,741,493                  | 21,419                         | 3,172                                                              | 1,716,902                                                             | --                        | 2,220,176            |
| Other West European countries.....                                                     | 205,523                                                  | 18,160                     | --                             | --                                                                 | 18,160                                                                | --                        | 187,363              |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

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

[Money amounts are in thousands of dollars]

| Selected country of incorporation of the 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued |                            |                                |                                                                    |                                                                       |                           |                    |
|----------------------------------------------------------------------------------------|----------------------------------------------------------|----------------------------|--------------------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------|---------------------------|--------------------|
|                                                                                        | Receipts by foreign corporations from                    |                            |                                |                                                                    |                                                                       |                           |                    |
|                                                                                        | All sources                                              | All related parties, total | U.S. corporation filing return | Domestic corporations controlled by U.S. corporation filing return | Any foreign corporations controlled by U.S. corporation filing return | All other related parties | Unrelated parties  |
|                                                                                        | (17)                                                     | (18)                       | (19)                           | (20)                                                               | (21)                                                                  | (22)                      | (23)               |
| <b>Europe, total--Continued</b>                                                        |                                                          |                            |                                |                                                                    |                                                                       |                           |                    |
| East European countries, total .....                                                   | 18,263,474                                               | 4,326,282                  | 279,504                        | 246,736                                                            | 3,800,042                                                             | --                        | 14,152,244         |
| Czech Republic.....                                                                    | 2,879,657                                                | 636,186                    | 4,540                          | 38,986                                                             | 592,659                                                               | --                        | 2,243,471          |
| Hungary.....                                                                           | 5,726,935                                                | 1,402,732                  | 162,335                        | 37,373                                                             | 1,203,023                                                             | --                        | 4,327,709          |
| Poland.....                                                                            | 5,595,530                                                | 961,542                    | 105,546                        | 9,261                                                              | 846,736                                                               | --                        | 4,844,949          |
| Russia.....                                                                            | 2,621,074                                                | 1,063,444                  | --                             | 155,177                                                            | 908,267                                                               | --                        | 1,557,630          |
| Slovakia.....                                                                          | 320,137                                                  | 92,687                     | 4,687                          | 5,126                                                              | 82,874                                                                | --                        | 228,035            |
| Ukraine.....                                                                           | 396,947                                                  | 201                        | --                             | 82                                                                 | 119                                                                   | --                        | 396,746            |
| Other East European countries and former Soviet Union.....                             | 723,195                                                  | 169,490                    | 2,396                          | 731                                                                | 166,363                                                               | --                        | 553,705            |
| <b>Africa, total.....</b>                                                              | <b>13,562,950</b>                                        | <b>2,964,868</b>           | <b>435,026</b>                 | <b>720,241</b>                                                     | <b>1,809,601</b>                                                      | <b>--</b>                 | <b>10,768,838</b>  |
| North Africa, total.....                                                               | 1,302,899                                                | 86,073                     | --                             | 370                                                                | 85,703                                                                | --                        | 1,224,512          |
| East Africa, total.....                                                                | 2,028,144                                                | 1,463,416                  | 433,140                        | 54,206                                                             | 976,070                                                               | --                        | 727,799            |
| Mauritius.....                                                                         | 1,220,934                                                | 1,045,905                  | 433,140                        | 32,015                                                             | 580,749                                                               | --                        | 338,100            |
| Other East African countries.....                                                      | 807,210                                                  | 417,511                    | --                             | 22,190                                                             | 395,320                                                               | --                        | 389,700            |
| West and Central Africa, total.....                                                    | 3,443,215                                                | 1,100,781                  | --                             | 631,418                                                            | 469,363                                                               | --                        | 2,342,434          |
| Liberia.....                                                                           | 2,090,867                                                | 885,774                    | --                             | 586,976                                                            | 298,798                                                               | --                        | 1,205,093          |
| Nigeria.....                                                                           | 896,575                                                  | --                         | --                             | --                                                                 | --                                                                    | --                        | 896,575            |
| Other West and Central African countries.....                                          | 455,772                                                  | 215,007                    | --                             | 44,442                                                             | 170,565                                                               | --                        | 240,765            |
| Southern Africa, total.....                                                            | 6,788,692                                                | 314,598                    | 1,886                          | 34,247                                                             | 278,465                                                               | --                        | 6,474,093          |
| South Africa (including Namibia).....                                                  | 5,105,589                                                | 310,393                    | 1,886                          | 32,305                                                             | 276,202                                                               | --                        | 4,795,196          |
| Other Southern Africa countries.....                                                   | 1,683,103                                                | 4,205                      | --                             | 1,942                                                              | 2,263                                                                 | --                        | 1,678,898          |
| <b>Asia, total.....</b>                                                                | <b>290,597,614</b>                                       | <b>90,652,077</b>          | <b>24,095,586</b>              | <b>11,826,410</b>                                                  | <b>54,645,929</b>                                                     | <b>84,152</b>             | <b>202,333,292</b> |
| Middle East, total.....                                                                | 5,356,508                                                | 2,989,967                  | 2,079,872                      | 212,818                                                            | 697,277                                                               | --                        | 2,419,210          |
| Cyprus.....                                                                            | 131,407                                                  | 6,669                      | --                             | --                                                                 | 6,669                                                                 | --                        | 124,738            |
| Israel (and the West Bank).....                                                        | 5,026,077                                                | 2,921,905                  | 2,079,872                      | 209,900                                                            | 632,133                                                               | --                        | 2,156,793          |
| Other Middle East countries .....                                                      | 199,024                                                  | 61,393                     | --                             | 2,918                                                              | 58,475                                                                | --                        | 137,679            |
| Southern and Southeastern Asia, total.....                                             | 79,511,144                                               | 38,788,581                 | 14,206,184                     | 7,582,299                                                          | 16,950,889                                                            | 49,209                    | 42,429,604         |
| India.....                                                                             | 3,405,590                                                | 710,139                    | 204,778                        | 228,235                                                            | 277,126                                                               | --                        | 2,695,451          |
| Indonesia.....                                                                         | 2,967,807                                                | 1,647,720                  | --                             | 1,522,033                                                          | 125,687                                                               | --                        | 1,320,087          |
| Malaysia.....                                                                          | 13,572,618                                               | 10,796,187                 | 4,799,399                      | 1,744,990                                                          | 4,251,799                                                             | --                        | 2,797,101          |
| Philippines .....                                                                      | 7,031,791                                                | 3,602,036                  | 2,054,244                      | 69,058                                                             | 1,478,734                                                             | --                        | 3,437,401          |
| Singapore.....                                                                         | 41,921,943                                               | 18,838,188                 | 6,971,881                      | 3,103,325                                                          | 8,713,774                                                             | 49,209                    | 24,762,478         |
| Thailand.....                                                                          | 10,087,918                                               | 2,791,504                  | 175,882                        | 610,055                                                            | 2,005,568                                                             | --                        | 7,296,414          |
| Other Southern and Southeastern Asian countries.....                                   | 523,478                                                  | 402,806                    | --                             | 304,605                                                            | 98,201                                                                | --                        | 120,672            |
| Eastern Asia, total.....                                                               | 205,729,962                                              | 48,873,530                 | 7,809,530                      | 4,031,293                                                          | 36,997,763                                                            | 34,943                    | 157,484,478        |
| China.....                                                                             | 21,613,538                                               | 8,631,646                  | 2,361,655                      | 250,182                                                            | 6,019,809                                                             | --                        | 13,150,632         |
| Hong Kong.....                                                                         | 28,928,071                                               | 10,139,256                 | 1,598,488                      | 2,011,225                                                          | 6,494,601                                                             | 34,943                    | 19,013,922         |
| Japan (including Okinawa and Ryukyu Islands).....                                      | 117,083,517                                              | 24,927,012                 | 2,855,051                      | 841,557                                                            | 21,230,405                                                            | --                        | 92,375,108         |
| South Korea, Republic of.....                                                          | 23,943,225                                               | 2,401,932                  | 526,296                        | 79,879                                                             | 1,795,756                                                             | --                        | 21,541,293         |
| Taiwan.....                                                                            | 14,161,610                                               | 2,773,683                  | 468,041                        | 848,449                                                            | 1,457,193                                                             | --                        | 11,403,523         |
| <b>Oceania, total.....</b>                                                             | <b>51,605,992</b>                                        | <b>8,830,024</b>           | <b>888,392</b>                 | <b>1,115,448</b>                                                   | <b>6,826,183</b>                                                      | <b>--</b>                 | <b>42,948,927</b>  |
| Australia.....                                                                         | 45,501,525                                               | 7,913,605                  | 873,565                        | 1,043,831                                                          | 5,996,209                                                             | --                        | 37,757,348         |
| New Zealand.....                                                                       | 5,825,524                                                | 748,014                    | 14,827                         | 3,930                                                              | 729,257                                                               | --                        | 5,078,504          |
| Other countries of Oceania.....                                                        | 278,943                                                  | 168,405                    | --                             | 67,687                                                             | 100,718                                                               | --                        | 113,074            |
| <b>Puerto Rico and U.S. Possessions, total .....</b>                                   | <b>11,088,354</b>                                        | <b>3,551,873</b>           | <b>1,617,992</b>               | <b>974,600</b>                                                     | <b>959,281</b>                                                        | <b>--</b>                 | <b>7,536,481</b>   |
| Puerto Rico.....                                                                       | 10,846,188                                               | 3,550,951                  | 1,617,415                      | 974,570                                                            | 958,966                                                               | --                        | 7,295,237          |
| U.S. Possessions, total.....                                                           | 242,166                                                  | 922                        | 577                            | 30                                                                 | 315                                                                   | --                        | 241,245            |
| <b>OPEC countries, total (some countries included above).....</b>                      | <b>10,999,704</b>                                        | <b>2,551,772</b>           | <b>558,502</b>                 | <b>1,539,624</b>                                                   | <b>453,646</b>                                                        | <b>--</b>                 | <b>8,455,789</b>   |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

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

[Money amounts are in thousands of dollars]

| Selected country of incorporation of the 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued |                            |                                |                                                                    |                                                                       |                           |                      |
|----------------------------------------------------------------------------------------|----------------------------------------------------------|----------------------------|--------------------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------|---------------------------|----------------------|
|                                                                                        | Payments by foreign corporations to                      |                            |                                |                                                                    |                                                                       |                           |                      |
|                                                                                        | All recipients                                           | All related parties, total | U.S. corporation filing return | Domestic corporations controlled by U.S. corporation filing return | Any foreign corporations controlled by U.S. corporation filing return | All other related parties | Unrelated parties    |
|                                                                                        | (24)                                                     | (25)                       | (26)                           | (27)                                                               | (28)                                                                  | (29)                      | (30)                 |
| <b>All geographic areas.....</b>                                                       | <b>2,198,534,646</b>                                     | <b>657,141,184</b>         | <b>146,668,914</b>             | <b>117,014,977</b>                                                 | <b>392,364,469</b>                                                    | <b>1,092,825</b>          | <b>1,553,932,369</b> |
| Canada.....                                                                            | 262,009,251                                              | 54,112,462                 | 18,834,085                     | 13,174,473                                                         | 21,238,696                                                            | 865,208                   | 208,460,938          |
| <b>Latin America, total.....</b>                                                       | <b>245,589,207</b>                                       | <b>49,284,957</b>          | <b>14,511,541</b>              | <b>15,720,315</b>                                                  | <b>19,046,621</b>                                                     | <b>6,479</b>              | <b>196,518,429</b>   |
| Mexico.....                                                                            | 96,920,113                                               | 22,076,770                 | 6,929,795                      | 7,909,371                                                          | 7,236,601                                                             | 1,002                     | 74,864,532           |
| Central America, total.....                                                            | 4,912,066                                                | 1,698,914                  | 202,879                        | 949,106                                                            | 545,792                                                               | 1,136                     | 3,213,152            |
| Costa Rica .....                                                                       | 627,907                                                  | 241,976                    | 159,457                        | 66,263                                                             | 16,256                                                                | --                        | 385,932              |
| Guatemala .....                                                                        | 733,645                                                  | 214,444                    | --                             | 152,313                                                            | 62,131                                                                | --                        | 519,201              |
| Panama (including Canal Zone) .....                                                    | 3,116,130                                                | 1,181,333                  | 43,423                         | 727,567                                                            | 409,207                                                               | 1,136                     | 1,934,797            |
| Other Central American countries.....                                                  | 434,384                                                  | 61,161                     | --                             | 2,963                                                              | 58,198                                                                | --                        | 373,223              |
| Caribbean countries, total.....                                                        | 51,012,327                                               | 13,072,093                 | 4,590,885                      | 3,521,560                                                          | 4,956,986                                                             | 2,661                     | 38,022,468           |
| Barbados.....                                                                          | 1,033,612                                                | 696,811                    | 420,844                        | 107,467                                                            | 168,501                                                               | --                        | 368,267              |
| Cayman Islands (British).....                                                          | 48,573,466                                               | 12,104,447                 | 3,958,746                      | 3,372,610                                                          | 4,770,429                                                             | 2,661                     | 36,519,787           |
| Trinidad and Tobago.....                                                               | 255,759                                                  | 54,012                     | --                             | 35,956                                                             | 18,056                                                                | --                        | 201,747              |
| Other Caribbean countries.....                                                         | 1,149,490                                                | 216,822                    | 211,295                        | 5,527                                                              | --                                                                    | --                        | 932,668              |
| South America, total.....                                                              | 92,744,700                                               | 12,437,181                 | 2,787,981                      | 3,340,278                                                          | 6,307,242                                                             | 1,680                     | 80,418,277           |
| Argentina.....                                                                         | 16,945,159                                               | 1,078,828                  | 298,115                        | 135,209                                                            | 643,824                                                               | 1,680                     | 15,866,330           |
| Brazil.....                                                                            | 57,197,446                                               | 8,214,013                  | 1,715,266                      | 2,750,843                                                          | 3,747,904                                                             | --                        | 49,091,006           |
| Chile.....                                                                             | 5,601,621                                                | 1,196,791                  | 412,964                        | 320,473                                                            | 463,354                                                               | --                        | 4,407,573            |
| Colombia.....                                                                          | 3,601,863                                                | 400,817                    | 63,430                         | 28,192                                                             | 309,196                                                               | --                        | 3,201,046            |
| Peru.....                                                                              | 1,386,542                                                | 127,698                    | 22,438                         | 14,435                                                             | 90,826                                                                | --                        | 1,258,859            |
| Venezuela.....                                                                         | 6,680,746                                                | 1,144,192                  | 246,685                        | 85,153                                                             | 812,355                                                               | --                        | 5,536,553            |
| Other South American countries.....                                                    | 1,331,323                                                | 274,841                    | 29,084                         | 5,973                                                              | 239,784                                                               | --                        | 1,056,909            |
| <b>Other Western Hemisphere, total.....</b>                                            | <b>116,592,117</b>                                       | <b>50,969,155</b>          | <b>13,707,788</b>              | <b>13,747,725</b>                                                  | <b>23,513,225</b>                                                     | <b>417</b>                | <b>66,674,475</b>    |
| Bahamas.....                                                                           | 20,786,316                                               | 8,818,717                  | 178,024                        | 4,868,353                                                          | 3,772,339                                                             | --                        | 12,095,871           |
| Bermuda .....                                                                          | 75,635,362                                               | 28,572,589                 | 7,283,212                      | 6,933,947                                                          | 14,355,014                                                            | 417                       | 47,068,090           |
| Netherlands Antilles.....                                                              | 8,134,379                                                | 6,296,762                  | 2,054,057                      | 357,405                                                            | 3,885,299                                                             | --                        | 1,838,352            |
| Other British West Indies.....                                                         | 9,349,934                                                | 5,721,418                  | 4,192,494                      | 326,974                                                            | 1,201,950                                                             | --                        | 4,545,704            |
| <b>Europe, total.....</b>                                                              | <b>1,220,309,647</b>                                     | <b>381,546,348</b>         | <b>63,449,528</b>              | <b>55,110,442</b>                                                  | <b>262,983,929</b>                                                    | <b>2,448</b>              | <b>848,276,229</b>   |
| European Union, total .....                                                            | 1,088,075,673                                            | 331,641,387                | 51,328,166                     | 48,101,089                                                         | 232,209,684                                                           | 2,448                     | 761,584,894          |
| Austria.....                                                                           | 9,756,663                                                | 3,199,724                  | 124,500                        | 1,265,471                                                          | 1,809,754                                                             | --                        | 6,558,167            |
| Belgium.....                                                                           | 27,472,968                                               | 8,393,735                  | 1,023,610                      | 1,022,456                                                          | 6,347,668                                                             | --                        | 19,079,488           |
| Denmark.....                                                                           | 4,774,238                                                | 1,411,635                  | 180,719                        | 201,102                                                            | 1,029,814                                                             | --                        | 3,367,861            |
| Finland.....                                                                           | 2,096,200                                                | 882,963                    | 95,985                         | 20,075                                                             | 766,903                                                               | --                        | 1,213,237            |
| France (including Andorra and Corsica).....                                            | 91,019,466                                               | 29,486,214                 | 3,127,675                      | 2,077,227                                                          | 24,281,311                                                            | --                        | 61,608,195           |
| Germany.....                                                                           | 136,266,872                                              | 30,243,904                 | 3,438,233                      | 2,995,323                                                          | 23,810,348                                                            | --                        | 106,191,937          |
| Greece.....                                                                            | 845,722                                                  | 187,547                    | 8,620                          | 35,599                                                             | 143,329                                                               | --                        | 658,174              |
| Ireland.....                                                                           | 44,452,932                                               | 23,494,983                 | 8,256,645                      | 4,230,165                                                          | 11,008,173                                                            | --                        | 21,858,147           |
| Italy (including San Marino).....                                                      | 42,660,196                                               | 16,793,185                 | 1,743,558                      | 802,604                                                            | 14,245,093                                                            | 1,929                     | 25,871,001           |
| Luxembourg .....                                                                       | 72,507,586                                               | 17,138,092                 | 975,038                        | 3,887,949                                                          | 12,275,105                                                            | --                        | 55,413,307           |
| Netherlands.....                                                                       | 234,832,165                                              | 86,125,942                 | 17,692,862                     | 10,230,212                                                         | 58,202,548                                                            | 320                       | 149,659,390          |
| Portugal.....                                                                          | 4,659,793                                                | 1,004,414                  | 58,850                         | 79,590                                                             | 865,974                                                               | --                        | 3,655,379            |
| Spain.....                                                                             | 60,082,859                                               | 12,312,083                 | 939,226                        | 1,609,133                                                          | 9,763,724                                                             | --                        | 47,785,021           |
| Sweden.....                                                                            | 26,828,503                                               | 10,406,977                 | 1,229,623                      | 1,269,183                                                          | 7,908,171                                                             | --                        | 16,421,526           |
| United Kingdom.....                                                                    | 329,819,511                                              | 90,559,990                 | 12,433,021                     | 18,375,001                                                         | 59,751,768                                                            | 200                       | 242,244,063          |
| Other West European countries, total.....                                              | 115,341,122                                              | 46,054,923                 | 11,673,580                     | 6,718,409                                                          | 27,662,934                                                            | --                        | 73,593,698           |
| Norway.....                                                                            | 5,408,782                                                | 962,385                    | 188,397                        | 80,745                                                             | 693,242                                                               | --                        | 4,446,397            |
| Switzerland.....                                                                       | 105,879,701                                              | 44,509,076                 | 11,381,707                     | 6,586,638                                                          | 26,540,731                                                            | --                        | 65,678,123           |
| Turkey.....                                                                            | 3,883,952                                                | 526,607                    | 103,477                        | 41,426                                                             | 381,704                                                               | --                        | 3,357,344            |
| Other West European countries.....                                                     | 168,689                                                  | 56,855                     | --                             | 9,599                                                              | 47,256                                                                | --                        | 111,833              |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

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

[Money amounts are in thousands of dollars]

| Selected country of incorporation of the 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued |                            |                                |                                                                    |                                                                       |                           |                    |
|----------------------------------------------------------------------------------------|----------------------------------------------------------|----------------------------|--------------------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------|---------------------------|--------------------|
|                                                                                        | Payments by foreign corporations to                      |                            |                                |                                                                    |                                                                       |                           |                    |
|                                                                                        | All recipients                                           | All related parties, total | U.S. corporation filing return | Domestic corporations controlled by U.S. corporation filing return | Any foreign corporations controlled by U.S. corporation filing return | All other related parties | Unrelated parties  |
|                                                                                        | (24)                                                     | (25)                       | (26)                           | (27)                                                               | (28)                                                                  | (29)                      | (30)               |
| <b>Europe, total--Continued</b>                                                        |                                                          |                            |                                |                                                                    |                                                                       |                           |                    |
| East European countries, total .....                                                   | 16,892,851                                               | 3,850,037                  | 447,782                        | 290,944                                                            | 3,111,311                                                             | --                        | 13,097,638         |
| Czech Republic.....                                                                    | 2,580,250                                                | 435,847                    | 17,907                         | 51,473                                                             | 366,467                                                               | --                        | 2,144,705          |
| Hungary.....                                                                           | 5,357,345                                                | 863,592                    | 130,119                        | 107,162                                                            | 626,312                                                               | --                        | 4,493,772          |
| Poland.....                                                                            | 5,248,218                                                | 885,516                    | 251,773                        | 103,607                                                            | 530,137                                                               | --                        | 4,417,189          |
| Russia.....                                                                            | 2,355,931                                                | 1,329,916                  | 15,628                         | 9,472                                                              | 1,304,816                                                             | --                        | 1,026,016          |
| Slovakia.....                                                                          | 293,650                                                  | 54,410                     | 12,711                         | 15,074                                                             | 26,625                                                                | --                        | 239,240            |
| Ukraine.....                                                                           | 365,038                                                  | 120,488                    | --                             | 2,514                                                              | 117,975                                                               | --                        | 244,550            |
| Other East European countries and former Soviet Union.....                             | 692,418                                                  | 160,267                    | 19,645                         | 1,642                                                              | 138,980                                                               | --                        | 532,166            |
| <b>Africa, total.....</b>                                                              | <b>12,732,799</b>                                        | <b>2,306,067</b>           | <b>391,312</b>                 | <b>399,748</b>                                                     | <b>1,515,007</b>                                                      | --                        | <b>10,426,731</b>  |
| North Africa, total.....                                                               | 1,317,858                                                | 133,609                    | 20,875                         | 3,326                                                              | 109,408                                                               | --                        | 1,184,249          |
| East Africa, total.....                                                                | 1,845,734                                                | 599,855                    | 202,098                        | 121,187                                                            | 276,569                                                               | --                        | 1,245,879          |
| Mauritius.....                                                                         | 1,033,727                                                | 207,790                    | 158,104                        | 8,394                                                              | 41,292                                                                | --                        | 825,937            |
| Other East African countries.....                                                      | 812,006                                                  | 392,064                    | 43,994                         | 112,793                                                            | 235,277                                                               | --                        | 419,942            |
| West and Central Africa, total.....                                                    | 3,228,357                                                | 965,156                    | 131,652                        | 145,471                                                            | 688,033                                                               | --                        | 2,263,201          |
| Liberia.....                                                                           | 1,846,585                                                | 784,254                    | 53,333                         | 57,678                                                             | 673,242                                                               | --                        | 1,062,331          |
| Nigeria.....                                                                           | 932,872                                                  | 128,592                    | 78,319                         | 35,954                                                             | 14,319                                                                | --                        | 804,280            |
| Other West and Central African countries.....                                          | 448,901                                                  | 52,311                     | --                             | 51,839                                                             | 472                                                                   | --                        | 396,590            |
| Southern Africa, total.....                                                            | 6,340,850                                                | 607,448                    | 36,686                         | 129,764                                                            | 440,998                                                               | --                        | 5,733,403          |
| South Africa (including Namibia).....                                                  | 4,817,332                                                | 601,936                    | 36,686                         | 129,248                                                            | 436,001                                                               | --                        | 4,215,396          |
| Other Southern Africa countries.....                                                   | 1,523,518                                                | 5,512                      | --                             | 516                                                                | 4,996                                                                 | --                        | 1,518,007          |
| <b>Asia, total.....</b>                                                                | <b>282,160,180</b>                                       | <b>103,446,313</b>         | <b>32,303,303</b>              | <b>15,789,809</b>                                                  | <b>55,135,239</b>                                                     | <b>217,963</b>            | <b>179,714,848</b> |
| Middle East, total.....                                                                | 4,931,262                                                | 1,136,544                  | 232,527                        | 152,353                                                            | 751,664                                                               | --                        | 3,922,126          |
| Cyprus.....                                                                            | 176,354                                                  | 93,714                     | --                             | 40,564                                                             | 53,151                                                                | --                        | 82,640             |
| Israel (and the West Bank).....                                                        | 4,566,705                                                | 972,597                    | 232,522                        | 106,166                                                            | 633,909                                                               | --                        | 3,721,517          |
| Other Middle East countries .....                                                      | 188,203                                                  | 70,233                     | 5                              | 5,624                                                              | 64,604                                                                | --                        | 117,969            |
| Southern and Southeastern Asia, total.....                                             | 78,379,359                                               | 30,379,645                 | 12,777,117                     | 4,999,980                                                          | 12,517,410                                                            | 85,138                    | 48,208,188         |
| India.....                                                                             | 3,135,674                                                | 632,284                    | 305,691                        | 43,235                                                             | 283,358                                                               | --                        | 2,503,391          |
| Indonesia.....                                                                         | 2,588,851                                                | 676,875                    | --                             | 59,743                                                             | 617,132                                                               | --                        | 1,911,976          |
| Malaysia.....                                                                          | 13,840,413                                               | 5,874,305                  | 3,297,961                      | 191,935                                                            | 2,384,408                                                             | --                        | 7,966,109          |
| Philippines .....                                                                      | 6,440,177                                                | 3,389,966                  | 2,204,241                      | 706,471                                                            | 479,254                                                               | --                        | 3,061,543          |
| Singapore.....                                                                         | 42,185,819                                               | 18,718,847                 | 6,853,293                      | 3,803,335                                                          | 7,977,229                                                             | 84,990                    | 23,664,115         |
| Thailand.....                                                                          | 9,707,917                                                | 1,068,821                  | 115,931                        | 184,741                                                            | 768,002                                                               | 148                       | 8,639,096          |
| Other Southern and Southeastern Asian countries.....                                   | 480,506                                                  | 18,548                     | --                             | 10,521                                                             | 8,027                                                                 | --                        | 461,959            |
| Eastern Asia, total.....                                                               | 198,849,560                                              | 71,930,124                 | 19,293,659                     | 10,637,475                                                         | 41,866,165                                                            | 132,825                   | 127,584,535        |
| China.....                                                                             | 20,856,206                                               | 8,443,789                  | 2,980,923                      | 767,490                                                            | 4,695,343                                                             | 32                        | 12,456,012         |
| Hong Kong.....                                                                         | 27,735,809                                               | 13,124,768                 | 2,707,446                      | 1,870,465                                                          | 8,503,497                                                             | 43,361                    | 14,863,596         |
| Japan (including Okinawa and Ryukyu Islands).....                                      | 113,982,385                                              | 38,725,667                 | 9,874,091                      | 6,678,432                                                          | 22,157,654                                                            | 15,491                    | 75,600,306         |
| South Korea, Republic of.....                                                          | 22,383,065                                               | 7,188,885                  | 1,821,866                      | 763,396                                                            | 4,561,526                                                             | 42,097                    | 15,194,180         |
| Taiwan.....                                                                            | 13,892,095                                               | 4,447,015                  | 1,909,333                      | 557,692                                                            | 1,948,145                                                             | 31,845                    | 9,470,441          |
| <b>Oceania, total.....</b>                                                             | <b>50,259,342</b>                                        | <b>12,138,449</b>          | <b>2,093,653</b>               | <b>1,702,685</b>                                                   | <b>8,341,802</b>                                                      | <b>310</b>                | <b>38,233,129</b>  |
| Australia.....                                                                         | 44,066,568                                               | 10,857,955                 | 2,010,973                      | 1,452,634                                                          | 7,394,038                                                             | 310                       | 33,284,153         |
| New Zealand.....                                                                       | 5,726,194                                                | 1,080,023                  | 82,679                         | 121,066                                                            | 876,278                                                               | --                        | 4,682,869          |
| Other countries of Oceania.....                                                        | 466,579                                                  | 200,471                    | --                             | 128,985                                                            | 71,486                                                                | --                        | 266,108            |
| <b>Puerto Rico and U.S. Possessions, total .....</b>                                   | <b>8,882,103</b>                                         | <b>3,337,432</b>           | <b>1,377,704</b>               | <b>1,369,779</b>                                                   | <b>589,949</b>                                                        | --                        | <b>5,627,589</b>   |
| Puerto Rico.....                                                                       | 8,617,371                                                | 3,313,770                  | 1,362,355                      | 1,368,776                                                          | 582,639                                                               | --                        | 5,386,519          |
| U.S. Possessions, total.....                                                           | 264,732                                                  | 23,662                     | 15,350                         | 1,003                                                              | 7,310                                                                 | --                        | 241,070            |
| <b>OPEC countries, total (some countries included above)</b>                           | <b>10,349,591</b>                                        | <b>2,012,366</b>           | <b>325,009</b>                 | <b>180,850</b>                                                     | <b>1,506,507</b>                                                      | --                        | <b>8,337,225</b>   |

<sup>1</sup> Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one country of incorporation.

NOTE: Detail may not add to totals because of rounding and because data are shown for selected countries only.



# Controlled Foreign Corporations, 2002

**Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation**

[Money amounts are in thousands of dollars]

| Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations | Number of U.S. corporation returns <sup>1</sup> | 7,500 largest Controlled Foreign Corporations |                   |               |                |
|----------------------------------------------------------------------------------------------------------------|-------------------------------------------------|-----------------------------------------------|-------------------|---------------|----------------|
|                                                                                                                |                                                 | Number of foreign corporations                | Total assets      |               | Total receipts |
|                                                                                                                |                                                 |                                               | Beginning of year | End of year   |                |
|                                                                                                                | (1)                                             | (2)                                           | (3)               | (4)           | (5)            |
| <b>All geographic areas</b>                                                                                    |                                                 |                                               |                   |               |                |
| All industries.....                                                                                            | 1,079                                           | 7,500                                         | 4,949,650,029     | 5,834,059,131 | 2,280,609,940  |
| Raw materials and energy production.....                                                                       | 115                                             | 458                                           | 287,756,355       | 303,293,883   | 113,151,370    |
| Goods production.....                                                                                          | 491                                             | 2,165                                         | 1,030,177,179     | 1,200,329,734 | 1,071,845,768  |
| Distribution and transportation of goods.....                                                                  | 275                                             | 864                                           | 312,073,971       | 355,638,840   | 542,127,900    |
| Information.....                                                                                               | 67                                              | 240                                           | 163,962,626       | 187,829,896   | 54,766,307     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 387                                             | 1,816                                         | 2,167,688,681     | 2,586,532,983 | 254,388,811    |
| Services.....                                                                                                  | 585                                             | 1,957                                         | 987,991,217       | 1,200,433,796 | 244,329,784    |
| <b>Argentina</b>                                                                                               |                                                 |                                               |                   |               |                |
| All industries.....                                                                                            | 71                                              | 116                                           | 27,707,003        | 12,560,451    | 11,939,159     |
| Raw materials and energy production.....                                                                       | 15                                              | 28                                            | 5,765,048         | 2,936,660     | 1,697,067      |
| Goods production.....                                                                                          | 27                                              | 29                                            | 6,658,920         | 3,587,457     | 4,281,342      |
| Distribution and transportation of goods.....                                                                  | 13                                              | 13                                            | 3,710,278         | 2,336,484     | 4,920,860      |
| Information.....                                                                                               | 5                                               | 6                                             | 2,891,145         | 1,448,883     | 341,031        |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 14                                              | 20                                            | 3,880,938         | 1,963,387     | 585,428        |
| Services.....                                                                                                  | 15                                              | 20                                            | 4,800,674         | 287,579       | 113,431        |
| <b>Australia</b>                                                                                               |                                                 |                                               |                   |               |                |
| All industries.....                                                                                            | 121                                             | 286                                           | 99,841,199        | 126,511,080   | 45,501,525     |
| Raw materials and energy production.....                                                                       | 18                                              | 46                                            | 15,785,211        | 18,260,276    | 3,668,561      |
| Goods production.....                                                                                          | 45                                              | 58                                            | 16,637,984        | 15,369,596    | 20,038,918     |
| Distribution and transportation of goods.....                                                                  | 23                                              | 25                                            | 5,134,083         | 2,918,743     | 10,437,968     |
| Information.....                                                                                               | 8                                               | 13                                            | 2,014,285         | 2,549,028     | 1,061,129      |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 38                                              | 82                                            | 39,446,134        | 54,965,939    | 5,091,832      |
| Services.....                                                                                                  | 41                                              | 62                                            | 20,823,501        | 32,447,496    | 5,203,118      |
| <b>Bahamas</b>                                                                                                 |                                                 |                                               |                   |               |                |
| All industries.....                                                                                            | 26                                              | 59                                            | 40,396,728        | 43,003,236    | 18,205,138     |
| Raw materials and energy production.....                                                                       | 11                                              | 27                                            | 14,051,051        | 14,289,635    | 2,355,967      |
| Goods production.....                                                                                          | 3                                               | 5                                             | 11,662,647        | 13,834,379    | 11,787,967     |
| Distribution and transportation of goods.....                                                                  | 5                                               | 8                                             | 1,834,415         | 1,979,874     | 2,617,917      |
| Information.....                                                                                               | --                                              | --                                            | --                | --            | --             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 9                                               | 12                                            | 5,982,437         | 5,631,525     | 1,121,571      |
| Services.....                                                                                                  | 4                                               | 7                                             | 6,866,179         | 7,267,823     | 321,716        |
| <b>Belgium</b>                                                                                                 |                                                 |                                               |                   |               |                |
| All industries.....                                                                                            | 78                                              | 124                                           | 61,753,825        | 66,031,291    | 28,915,544     |
| Raw materials and energy production.....                                                                       | --                                              | --                                            | --                | --            | --             |
| Goods production.....                                                                                          | 41                                              | 48                                            | 17,472,605        | 22,758,482    | 17,202,307     |
| Distribution and transportation of goods.....                                                                  | 19                                              | 19                                            | 4,460,765         | 5,318,748     | 6,242,841      |
| Information.....                                                                                               | 4                                               | 4                                             | 420,836           | 336,655       | 122,436        |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 25                                              | 27                                            | 24,952,938        | 24,620,586    | 2,206,553      |
| Services.....                                                                                                  | 23                                              | 26                                            | 14,446,681        | 12,996,820    | 3,141,407      |
| <b>Bermuda</b>                                                                                                 |                                                 |                                               |                   |               |                |
| All industries.....                                                                                            | 117                                             | 214                                           | 175,616,121       | 314,226,558   | 89,153,936     |
| Raw materials and energy production.....                                                                       | 11                                              | 28                                            | 13,009,095        | 14,159,745    | 9,207,889      |
| Goods production.....                                                                                          | 15                                              | 17                                            | 8,867,698         | 33,800,032    | 32,392,280     |
| Distribution and transportation of goods.....                                                                  | **                                              | **                                            | **                | **            | **             |
| Information.....                                                                                               | **                                              | **                                            | **                | **            | **             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 63                                              | 98                                            | 79,745,012        | 109,487,780   | 11,423,836     |
| Services.....                                                                                                  | 37                                              | 56                                            | 62,483,251        | 143,989,438   | 22,125,911     |
| <b>Brazil</b>                                                                                                  |                                                 |                                               |                   |               |                |
| All industries.....                                                                                            | 103                                             | 199                                           | 102,060,512       | 71,337,404    | 52,842,902     |
| Raw materials and energy production.....                                                                       | 14                                              | 19                                            | 16,100,158        | 11,567,523    | 10,561,117     |
| Goods production.....                                                                                          | 62                                              | 90                                            | 26,326,353        | 18,160,501    | 21,115,992     |
| Distribution and transportation of goods.....                                                                  | 13                                              | 15                                            | 5,251,212         | 6,170,272     | 9,256,966      |
| Information.....                                                                                               | 6                                               | 11                                            | 13,206,522        | 7,355,328     | 4,332,331      |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 18                                              | 29                                            | 24,980,408        | 20,518,131    | 5,801,478      |
| Services.....                                                                                                  | 25                                              | 35                                            | 16,195,860        | 7,565,648     | 1,775,018      |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

**Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations | Number of U.S. corporation returns <sup>1</sup> | 7,500 largest Controlled Foreign Corporations |                   |             |                |
|----------------------------------------------------------------------------------------------------------------|-------------------------------------------------|-----------------------------------------------|-------------------|-------------|----------------|
|                                                                                                                |                                                 | Number of foreign corporations                | Total assets      |             | Total receipts |
|                                                                                                                |                                                 |                                               | Beginning of year | End of year |                |
|                                                                                                                | (1)                                             | (2)                                           | (3)               | (4)         | (5)            |
| <b>Canada</b>                                                                                                  |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 377                                             | 748                                           | 457,713,355       | 523,801,019 | 274,040,598    |
| Raw materials and energy production.....                                                                       | 44                                              | 85                                            | 74,687,532        | 74,296,642  | 24,798,970     |
| Goods production.....                                                                                          | 169                                             | 219                                           | 117,126,855       | 142,668,356 | 149,952,684    |
| Distribution and transportation of goods.....                                                                  | 73                                              | 86                                            | 30,833,690        | 31,555,846  | 67,096,445     |
| Information.....                                                                                               | 15                                              | 21                                            | 4,220,416         | 5,112,677   | 2,306,134      |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 103                                             | 180                                           | 157,592,077       | 190,080,485 | 18,666,771     |
| Services.....                                                                                                  | 108                                             | 157                                           | 73,252,785        | 80,087,014  | 11,219,594     |
| <b>Cayman Islands (British)</b>                                                                                |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 140                                             | 320                                           | 248,613,818       | 287,386,881 | 42,394,370     |
| Raw materials and energy production.....                                                                       | 21                                              | 31                                            | 23,444,520        | 27,235,302  | 12,821,126     |
| Goods production.....                                                                                          | 23                                              | 30                                            | 22,249,896        | 37,908,856  | 15,427,659     |
| Distribution and transportation of goods.....                                                                  | **                                              | **                                            | **                | **          | **             |
| Information.....                                                                                               | **                                              | **                                            | **                | **          | **             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 59                                              | 141                                           | 111,373,464       | 130,583,680 | 4,921,234      |
| Services.....                                                                                                  | 57                                              | 112                                           | 90,213,317        | 90,536,429  | 7,423,424      |
| <b>Chile</b>                                                                                                   |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 38                                              | 64                                            | 20,480,608        | 20,189,290  | 5,293,037      |
| Raw materials and energy production.....                                                                       | 6                                               | 12                                            | 5,852,658         | 6,026,199   | 1,732,713      |
| Goods production.....                                                                                          | 7                                               | 7                                             | 1,280,975         | 1,086,307   | 571,655        |
| Distribution and transportation of goods.....                                                                  | 6                                               | 6                                             | 807,616           | 701,013     | 884,869        |
| Information.....                                                                                               | 3                                               | 5                                             | 1,897,500         | 2,005,506   | 752,817        |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 12                                              | 18                                            | 6,743,968         | 6,343,718   | 1,144,768      |
| Services.....                                                                                                  | 13                                              | 16                                            | 3,897,892         | 4,026,547   | 206,217        |
| <b>Denmark</b>                                                                                                 |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 36                                              | 51                                            | 12,006,888        | 12,332,928  | 4,540,009      |
| Raw materials and energy production.....                                                                       | --                                              | --                                            | --                | --          | --             |
| Goods production.....                                                                                          | 13                                              | 15                                            | 4,144,320         | 4,534,381   | 1,675,144      |
| Distribution and transportation of goods.....                                                                  | 7                                               | 7                                             | 958,920           | 1,121,734   | 1,178,592      |
| Information.....                                                                                               | --                                              | --                                            | --                | --          | --             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 7                                               | 10                                            | 2,590,765         | 3,102,549   | 398,411        |
| Services.....                                                                                                  | 18                                              | 19                                            | 4,312,883         | 3,574,263   | 1,287,861      |
| <b>France (including Andorra and Corsica)</b>                                                                  |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 183                                             | 370                                           | 146,758,335       | 158,620,830 | 92,603,968     |
| Raw materials and energy production.....                                                                       | 4                                               | 5                                             | 832,011           | 968,656     | 726,435        |
| Goods production.....                                                                                          | 94                                              | 140                                           | 42,143,264        | 48,770,406  | 55,868,266     |
| Distribution and transportation of goods.....                                                                  | 38                                              | 49                                            | 15,929,125        | 21,471,622  | 21,972,591     |
| Information.....                                                                                               | 5                                               | 9                                             | 1,515,604         | 2,240,859   | 1,332,346      |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 40                                              | 69                                            | 50,605,928        | 44,170,590  | 4,826,619      |
| Services.....                                                                                                  | 68                                              | 98                                            | 35,732,403        | 40,998,696  | 7,877,711      |
| <b>Germany</b>                                                                                                 |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 203                                             | 438                                           | 236,530,650       | 246,875,096 | 137,681,656    |
| Raw materials and energy production.....                                                                       | --                                              | --                                            | --                | --          | --             |
| Goods production.....                                                                                          | 107                                             | 152                                           | 68,727,079        | 81,235,209  | 86,658,405     |
| Distribution and transportation of goods.....                                                                  | 44                                              | 61                                            | 21,638,089        | 22,537,677  | 27,213,830     |
| Information.....                                                                                               | 11                                              | 16                                            | 3,145,398         | 13,543,152  | 3,157,652      |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 41                                              | 68                                            | 90,572,560        | 82,370,282  | 12,052,927     |
| Services.....                                                                                                  | 103                                             | 141                                           | 52,447,525        | 47,188,776  | 8,598,842      |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

**Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations | Number of U.S. corporation returns <sup>1</sup> | 7,500 largest Controlled Foreign Corporations |                   |             |                |
|----------------------------------------------------------------------------------------------------------------|-------------------------------------------------|-----------------------------------------------|-------------------|-------------|----------------|
|                                                                                                                |                                                 | Number of foreign corporations                | Total assets      |             | Total receipts |
|                                                                                                                |                                                 |                                               | Beginning of year | End of year |                |
|                                                                                                                | (1)                                             | (2)                                           | (3)               | (4)         | (5)            |
| <b>Hong Kong</b>                                                                                               |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 65                                              | 107                                           | 60,460,480        | 58,772,725  | 28,928,071     |
| Raw materials and energy production.....                                                                       | **                                              | **                                            | **                | **          | **             |
| Goods production.....                                                                                          | 18                                              | 18                                            | 3,260,529         | 3,049,980   | 6,743,418      |
| Distribution and transportation of goods.....                                                                  | 21                                              | 23                                            | 5,131,854         | 4,908,991   | 9,143,328      |
| Information.....                                                                                               | **                                              | **                                            | **                | **          | **             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 15                                              | 31                                            | 39,895,480        | 39,036,946  | 7,242,292      |
| Services.....                                                                                                  | 22                                              | 30                                            | 7,843,771         | 7,800,073   | 4,132,001      |
| <b>Ireland</b>                                                                                                 |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 115                                             | 197                                           | 136,744,517       | 161,875,794 | 52,801,938     |
| Raw materials and energy production.....                                                                       | --                                              | --                                            | --                | --          | --             |
| Goods production.....                                                                                          | 42                                              | 49                                            | 36,698,049        | 29,610,195  | 25,441,511     |
| Distribution and transportation of goods.....                                                                  | 11                                              | 13                                            | 3,899,720         | 3,630,638   | 5,900,123      |
| Information.....                                                                                               | 5                                               | 5                                             | 6,027,850         | 6,976,008   | 3,207,508      |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 49                                              | 83                                            | 50,717,101        | 65,321,607  | 4,171,928      |
| Services.....                                                                                                  | 39                                              | 47                                            | 39,401,797        | 56,337,346  | 14,080,869     |
| <b>Italy (including San Marino)</b>                                                                            |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 123                                             | 201                                           | 51,428,919        | 56,855,423  | 44,050,054     |
| Raw materials and energy production.....                                                                       | --                                              | --                                            | --                | --          | --             |
| Goods production.....                                                                                          | 66                                              | 104                                           | 24,131,283        | 26,443,873  | 22,653,975     |
| Distribution and transportation of goods.....                                                                  | 34                                              | 37                                            | 9,173,036         | 10,433,496  | 13,786,793     |
| Information.....                                                                                               | 5                                               | 7                                             | 389,771           | 1,989,613   | 709,854        |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 18                                              | 24                                            | 8,556,355         | 9,127,716   | 1,359,051      |
| Services.....                                                                                                  | 23                                              | 29                                            | 9,178,475         | 8,860,725   | 5,540,381      |
| <b>Japan (including Okinawa and Ryukyu Islands)</b>                                                            |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 123                                             | 225                                           | 206,989,938       | 203,953,894 | 117,083,517    |
| Raw materials and energy production.....                                                                       | --                                              | --                                            | --                | --          | --             |
| Goods production.....                                                                                          | 59                                              | 90                                            | 35,806,858        | 37,273,318  | 58,190,474     |
| Distribution and transportation of goods.....                                                                  | 43                                              | 52                                            | 16,473,992        | 15,319,091  | 23,332,550     |
| Information.....                                                                                               | 6                                               | 8                                             | 1,813,822         | 1,609,552   | 1,859,934      |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 21                                              | 45                                            | 125,101,844       | 131,694,176 | 13,491,514     |
| Services.....                                                                                                  | 19                                              | 30                                            | 27,793,422        | 18,057,758  | 20,209,045     |
| <b>Luxembourg</b>                                                                                              |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 83                                              | 118                                           | 163,133,608       | 236,826,464 | 74,762,046     |
| Raw materials and energy production.....                                                                       | **                                              | **                                            | **                | **          | **             |
| Goods production.....                                                                                          | 23                                              | 29                                            | 35,794,475        | 48,218,098  | 12,708,559     |
| Distribution and transportation of goods.....                                                                  | 5                                               | 5                                             | 20,424,956        | 33,306,477  | 40,628,959     |
| Information.....                                                                                               | **                                              | **                                            | **                | **          | **             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 25                                              | 36                                            | 42,437,066        | 73,277,038  | 3,571,786      |
| Services.....                                                                                                  | 40                                              | 45                                            | 61,641,877        | 79,466,790  | 15,834,445     |
| <b>Malaysia</b>                                                                                                |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 27                                              | 39                                            | 17,575,776        | 17,939,640  | 13,572,618     |
| Raw materials and energy production.....                                                                       | --                                              | --                                            | --                | --          | --             |
| Goods production.....                                                                                          | 19                                              | 23                                            | 7,588,069         | 7,285,244   | 11,848,209     |
| Distribution and transportation of goods.....                                                                  | 3                                               | 3                                             | 519,343           | 408,039     | 623,306        |
| Information.....                                                                                               | --                                              | --                                            | --                | --          | --             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 5                                               | 7                                             | 8,412,670         | 9,158,501   | 536,156        |
| Services.....                                                                                                  | 5                                               | 6                                             | 1,055,694         | 1,087,856   | 564,947        |
| <b>Mexico</b>                                                                                                  |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 139                                             | 293                                           | 175,364,530       | 184,437,288 | 102,334,686    |
| Raw materials and energy production.....                                                                       | 6                                               | 11                                            | 4,429,732         | 4,441,854   | 1,735,432      |
| Goods production.....                                                                                          | 82                                              | 112                                           | 34,881,730        | 33,477,399  | 52,628,890     |
| Distribution and transportation of goods.....                                                                  | 25                                              | 28                                            | 10,544,413        | 9,664,243   | 21,376,832     |
| Information.....                                                                                               | 3                                               | 8                                             | 1,864,665         | 2,018,194   | 1,771,777      |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 32                                              | 70                                            | 94,314,826        | 100,633,870 | 17,605,366     |
| Services.....                                                                                                  | 51                                              | 64                                            | 29,329,164        | 34,201,727  | 7,216,390      |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

**Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations | Number of U.S. corporation returns <sup>1</sup> | 7,500 largest Controlled Foreign Corporations |                   |             |                |
|----------------------------------------------------------------------------------------------------------------|-------------------------------------------------|-----------------------------------------------|-------------------|-------------|----------------|
|                                                                                                                |                                                 | Number of foreign corporations                | Total assets      |             | Total receipts |
|                                                                                                                |                                                 |                                               | Beginning of year | End of year |                |
|                                                                                                                | (1)                                             | (2)                                           | (3)               | (4)         | (5)            |
| <b>Netherlands</b>                                                                                             |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 292                                             | 559                                           | 417,757,399       | 523,038,005 | 249,977,190    |
| Raw materials and energy production.....                                                                       | 12                                              | 14                                            | 18,583,663        | 20,806,576  | 8,547,423      |
| Goods production.....                                                                                          | 112                                             | 139                                           | 171,837,257       | 221,701,199 | 143,497,319    |
| Distribution and transportation of goods.....                                                                  | 59                                              | 66                                            | 35,726,611        | 38,876,132  | 51,270,096     |
| Information.....                                                                                               | 11                                              | 19                                            | 21,729,301        | 25,428,732  | 9,117,036      |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 57                                              | 94                                            | 76,000,175        | 91,207,637  | 23,609,083     |
| Services.....                                                                                                  | 152                                             | 227                                           | 93,880,392        | 125,017,729 | 13,936,234     |
| <b>New Zealand</b>                                                                                             |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 21                                              | 42                                            | 18,841,739        | 27,127,309  | 5,825,524      |
| Raw materials and energy production.....                                                                       | 5                                               | 7                                             | 4,314,410         | 11,115,086  | 1,447,070      |
| Goods production.....                                                                                          | 6                                               | 8                                             | 7,139,671         | 9,105,394   | 2,412,096      |
| Distribution and transportation of goods.....                                                                  | 3                                               | 4                                             | 788,971           | 907,938     | 1,132,736      |
| Information.....                                                                                               | --                                              | --                                            | --                | --          | --             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 8                                               | 14                                            | 5,400,380         | 4,389,360   | 336,862        |
| Services.....                                                                                                  | 9                                               | 9                                             | 1,198,307         | 1,609,531   | 496,760        |
| <b>Norway</b>                                                                                                  |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 23                                              | 35                                            | 7,287,079         | 11,180,217  | 5,942,151      |
| Raw materials and energy production.....                                                                       | 6                                               | 6                                             | 3,036,426         | 4,455,464   | 1,873,967      |
| Goods production.....                                                                                          | 6                                               | 6                                             | 1,450,009         | 1,954,646   | 1,507,841      |
| Distribution and transportation of goods.....                                                                  | 7                                               | 11                                            | 1,212,607         | 2,288,617   | 1,457,227      |
| Information.....                                                                                               | **                                              | **                                            | **                | **          | **             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | **                                              | **                                            | **                | **          | **             |
| Services.....                                                                                                  | 5                                               | 6                                             | 465,331           | 1,087,038   | 571,069        |
| <b>Philippines</b>                                                                                             |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 19                                              | 36                                            | 12,761,702        | 13,167,166  | 7,031,791      |
| Raw materials and energy production.....                                                                       | 5                                               | 10                                            | 5,077,347         | 5,473,582   | 1,307,118      |
| Goods production.....                                                                                          | 10                                              | 10                                            | 3,225,790         | 3,022,111   | 4,582,891      |
| Distribution and transportation of goods.....                                                                  | --                                              | --                                            | --                | --          | --             |
| Information.....                                                                                               | --                                              | --                                            | --                | --          | --             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 4                                               | 10                                            | 3,296,529         | 3,369,545   | 787,229        |
| Services.....                                                                                                  | 4                                               | 6                                             | 1,162,035         | 1,301,927   | 354,553        |
| <b>Singapore</b>                                                                                               |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 76                                              | 112                                           | 49,447,808        | 56,327,591  | 41,921,943     |
| Raw materials and energy production.....                                                                       | **                                              | **                                            | **                | **          | **             |
| Goods production.....                                                                                          | 36                                              | 42                                            | 14,996,132        | 15,911,792  | 12,137,914     |
| Distribution and transportation of goods.....                                                                  | 21                                              | 25                                            | 7,523,994         | 8,405,516   | 24,090,210     |
| Information.....                                                                                               | **                                              | **                                            | **                | **          | **             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 15                                              | 21                                            | 20,121,377        | 22,061,988  | 769,456        |
| Services.....                                                                                                  | 18                                              | 20                                            | 6,557,228         | 9,482,641   | 4,487,603      |
| <b>South Korea, Republic of</b>                                                                                |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 55                                              | 66                                            | 19,328,556        | 22,244,751  | 23,943,225     |
| Raw materials and energy production.....                                                                       | 3                                               | 3                                             | 1,122,564         | 1,204,774   | 523,309        |
| Goods production.....                                                                                          | 28                                              | 30                                            | 11,881,025        | 13,325,368  | 14,732,607     |
| Distribution and transportation of goods.....                                                                  | 11                                              | 11                                            | 2,380,313         | 2,196,492   | 4,598,709      |
| Information.....                                                                                               | 3                                               | 3                                             | 635,214           | 785,410     | 1,028,617      |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 7                                               | 12                                            | 2,732,037         | 3,953,948   | 1,461,279      |
| Services.....                                                                                                  | 7                                               | 7                                             | 577,402           | 778,759     | 1,598,705      |
| <b>Spain</b>                                                                                                   |                                                 |                                               |                   |             |                |
| All industries.....                                                                                            | 115                                             | 175                                           | 61,612,031        | 89,921,565  | 63,088,803     |
| Raw materials and energy production.....                                                                       | **                                              | **                                            | **                | **          | **             |
| Goods production.....                                                                                          | 61                                              | 82                                            | 22,023,426        | 27,125,456  | 29,788,247     |
| Distribution and transportation of goods.....                                                                  | 24                                              | 26                                            | 15,607,850        | 19,635,619  | 28,270,228     |
| Information.....                                                                                               | **                                              | **                                            | **                | **          | **             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 22                                              | 28                                            | 12,108,358        | 12,926,112  | 2,095,952      |
| Services.....                                                                                                  | 28                                              | 32                                            | 10,595,911        | 29,516,951  | 2,320,279      |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

**Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations | Number of U.S. corporation returns <sup>1</sup> | 7,500 largest Controlled Foreign Corporations |                   |               |                |
|----------------------------------------------------------------------------------------------------------------|-------------------------------------------------|-----------------------------------------------|-------------------|---------------|----------------|
|                                                                                                                |                                                 | Number of foreign corporations                | Total assets      |               | Total receipts |
|                                                                                                                |                                                 |                                               | Beginning of year | End of year   |                |
|                                                                                                                | (1)                                             | (2)                                           | (3)               | (4)           | (5)            |
| <b>Sweden</b>                                                                                                  |                                                 |                                               |                   |               |                |
| All industries.....                                                                                            | 51                                              | 86                                            | 47,835,707        | 55,840,480    | 26,836,303     |
| Raw materials and energy production.....                                                                       | --                                              | --                                            | --                | --            | --             |
| Goods production.....                                                                                          | 23                                              | 26                                            | 12,681,484        | 14,908,133    | 16,689,512     |
| Distribution and transportation of goods.....                                                                  | 11                                              | 15                                            | 4,567,881         | 5,802,594     | 6,427,590      |
| Information.....                                                                                               | 3                                               | 3                                             | 903,476           | 1,235,113     | 736,863        |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 8                                               | 14                                            | 17,478,104        | 19,312,485    | 1,296,967      |
| Services.....                                                                                                  | 23                                              | 28                                            | 12,204,762        | 14,582,156    | 1,685,371      |
| <b>Switzerland</b>                                                                                             |                                                 |                                               |                   |               |                |
| All industries.....                                                                                            | 117                                             | 185                                           | 203,067,913       | 237,022,700   | 112,938,687    |
| Raw materials and energy production.....                                                                       | **                                              | **                                            | **                | **            | **             |
| Goods production.....                                                                                          | 41                                              | 49                                            | 83,288,715        | 86,185,929    | 35,593,650     |
| Distribution and transportation of goods.....                                                                  | 41                                              | 46                                            | 19,889,270        | 24,841,523    | 46,041,563     |
| Information.....                                                                                               | **                                              | **                                            | **                | **            | **             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 26                                              | 34                                            | 54,808,193        | 58,603,545    | 4,337,915      |
| Services.....                                                                                                  | 38                                              | 47                                            | 38,816,062        | 62,726,460    | 25,517,130     |
| <b>United Kingdom</b>                                                                                          |                                                 |                                               |                   |               |                |
| All industries.....                                                                                            | 425                                             | 1,189                                         | 1,372,507,597     | 1,676,635,595 | 334,600,338    |
| Raw materials and energy production.....                                                                       | 25                                              | 47                                            | 47,867,124        | 47,450,668    | 18,616,847     |
| Goods production.....                                                                                          | 162                                             | 233                                           | 104,876,619       | 116,243,430   | 115,791,324    |
| Distribution and transportation of goods.....                                                                  | 78                                              | 100                                           | 36,444,790        | 44,128,390    | 70,441,659     |
| Information.....                                                                                               | 27                                              | 56                                            | 80,700,128        | 96,072,019    | 12,921,771     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 146                                             | 343                                           | 901,547,100       | 1,158,704,171 | 75,246,744     |
| Services.....                                                                                                  | 210                                             | 410                                           | 201,071,835       | 214,036,917   | 41,581,992     |
| <b>Venezuela</b>                                                                                               |                                                 |                                               |                   |               |                |
| All industries.....                                                                                            | 28                                              | 41                                            | 16,635,494        | 13,635,597    | 6,968,791      |
| Raw materials and energy production.....                                                                       | 7                                               | 10                                            | 4,675,926         | 3,814,597     | 1,241,589      |
| Goods production.....                                                                                          | 11                                              | 12                                            | 4,818,454         | 4,347,540     | 2,272,329      |
| Distribution and transportation of goods.....                                                                  | **                                              | **                                            | **                | **            | **             |
| Information.....                                                                                               | **                                              | **                                            | **                | **            | **             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 5                                               | 6                                             | 1,743,630         | 1,459,528     | 649,573        |
| Services.....                                                                                                  | 7                                               | 9                                             | 3,167,911         | 1,925,682     | 656,762        |
| <b>European Union, total (some countries included above)</b>                                                   |                                                 |                                               |                   |               |                |
| All industries.....                                                                                            | 721                                             | 3,590                                         | 2,735,170,037     | 3,323,564,463 | 1,130,009,739  |
| Raw materials and energy production.....                                                                       | 39                                              | 70                                            | 68,428,940        | 70,936,849    | 28,767,081     |
| Goods production.....                                                                                          | 334                                             | 1,045                                         | 547,358,826       | 649,293,626   | 537,904,242    |
| Distribution and transportation of goods.....                                                                  | 169                                             | 412                                           | 170,783,144       | 208,385,813   | 275,903,211    |
| Information.....                                                                                               | 44                                              | 127                                           | 118,694,082       | 150,690,805   | 34,107,472     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 235                                             | 815                                           | 1,284,042,054     | 1,590,120,628 | 131,631,642    |
| Services.....                                                                                                  | 431                                             | 1,121                                         | 545,862,991       | 654,136,742   | 121,696,090    |
| <b>European Monetary Union, total (some countries included above)</b>                                          |                                                 |                                               |                   |               |                |
| All industries.....                                                                                            | 551                                             | 2,264                                         | 1,302,819,844     | 1,578,755,460 | 764,033,089    |
| Raw materials and energy production.....                                                                       | 18                                              | 23                                            | 20,561,816        | 23,486,181    | 10,150,234     |
| Goods production.....                                                                                          | 275                                             | 771                                           | 425,656,403       | 513,607,683   | 403,748,261    |
| Distribution and transportation of goods.....                                                                  | 129                                             | 290                                           | 128,811,553       | 157,333,096   | 197,855,369    |
| Information.....                                                                                               | 30                                              | 68                                            | 37,090,478        | 53,383,673    | 20,448,838     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 158                                             | 448                                           | 362,426,084       | 409,001,422   | 54,689,520     |
| Services.....                                                                                                  | 322                                             | 664                                           | 328,273,511       | 421,943,406   | 77,140,866     |
| <b>OPEC countries, total (some countries included above)</b>                                                   |                                                 |                                               |                   |               |                |
| All industries.....                                                                                            | 36                                              | 64                                            | 24,834,566        | 23,718,713    | 10,999,704     |
| Raw materials and energy production.....                                                                       | 12                                              | 19                                            | 10,821,962        | 11,112,698    | 3,550,079      |
| Goods production.....                                                                                          | 13                                              | 15                                            | 5,047,663         | 4,630,453     | 2,937,495      |
| Distribution and transportation of goods.....                                                                  | **                                              | **                                            | **                | **            | **             |
| Information.....                                                                                               | **                                              | **                                            | **                | **            | **             |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 10                                              | 14                                            | 3,291,794         | 3,653,618     | 1,182,533      |
| Services.....                                                                                                  | 7                                               | 9                                             | 3,167,911         | 1,925,682     | 656,762        |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

**Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued        |              |                                                                |                                           |                                                |                        |
|----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|--------------|----------------------------------------------------------------|-------------------------------------------|------------------------------------------------|------------------------|
|                                                                                                                | Current earnings and profits (less deficit) before income taxes | Income taxes | Current earnings and profits (less deficit) after income taxes | Distributions out of earnings and profits | Dividends paid to controlling U.S. corporation | Total Subpart F income |
|                                                                                                                | (6)                                                             | (7)          | (8)                                                            | (9)                                       | (10)                                           | (11)                   |
| <b>All geographic areas</b>                                                                                    |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 200,670,364                                                     | 38,610,284   | 162,060,079                                                    | 97,011,345                                | 27,045,099                                     | 31,420,940             |
| Raw materials and energy production.....                                                                       | 18,780,847                                                      | 5,742,786    | 13,038,061                                                     | 8,348,244                                 | 2,566,104                                      | 1,220,497              |
| Goods production.....                                                                                          | 80,199,064                                                      | 14,919,504   | 65,279,560                                                     | 32,217,593                                | 10,144,624                                     | 9,796,240              |
| Distribution and transportation of goods.....                                                                  | 23,972,584                                                      | 5,486,881    | 18,485,703                                                     | 12,168,493                                | 3,471,956                                      | 4,015,285              |
| Information.....                                                                                               | -4,054,940                                                      | 1,289,700    | -5,344,639                                                     | 1,455,156                                 | 632,771                                        | 1,028,793              |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 39,443,103                                                      | 6,536,216    | 32,906,887                                                     | 14,319,415                                | 2,060,460                                      | 7,233,374              |
| Services.....                                                                                                  | 42,329,705                                                      | 4,635,197    | 37,694,508                                                     | 28,502,444                                | 8,169,184                                      | 8,126,752              |
| <b>Argentina</b>                                                                                               |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | -1,500,517                                                      | 175,547      | -1,676,064                                                     | 35,830                                    | 25,753                                         | 21,833                 |
| Raw materials and energy production.....                                                                       | -237,778                                                        | 18,642       | -256,420                                                       | 8,557                                     | --                                             | 3,101                  |
| Goods production.....                                                                                          | -315,531                                                        | 61,715       | -377,246                                                       | 17,847                                    | 25,753                                         | 15,450                 |
| Distribution and transportation of goods.....                                                                  | -278,001                                                        | 79,569       | -357,570                                                       | 3,384                                     | --                                             | 3,050                  |
| Information.....                                                                                               | -442,708                                                        | --           | -442,708                                                       | --                                        | --                                             | --                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | -10,429                                                         | 14,445       | -24,874                                                        | 6,042                                     | --                                             | --                     |
| Services.....                                                                                                  | -216,070                                                        | 1,175        | -217,245                                                       | --                                        | --                                             | 232                    |
| <b>Australia</b>                                                                                               |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 4,069,092                                                       | 950,709      | 3,118,383                                                      | 1,929,464                                 | 713,208                                        | 426,921                |
| Raw materials and energy production.....                                                                       | 253,535                                                         | 77,239       | 176,296                                                        | 122,950                                   | 11,340                                         | 2,497                  |
| Goods production.....                                                                                          | 1,480,431                                                       | 466,048      | 1,014,383                                                      | 1,096,797                                 | 504,476                                        | 157,590                |
| Distribution and transportation of goods.....                                                                  | 481,180                                                         | 113,628      | 367,552                                                        | 44,806                                    | 25,631                                         | 17,992                 |
| Information.....                                                                                               | -39,137                                                         | 15,141       | -54,278                                                        | 19,543                                    | 7,891                                          | 17,174                 |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 886,244                                                         | 171,534      | 714,709                                                        | 247,472                                   | 27,102                                         | 199,418                |
| Services.....                                                                                                  | 1,006,839                                                       | 107,118      | 899,721                                                        | 397,896                                   | 136,767                                        | 32,251                 |
| <b>Bahamas</b>                                                                                                 |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 1,305,125                                                       | 281,243      | 1,023,882                                                      | 1,223,024                                 | 521,025                                        | 130,441                |
| Raw materials and energy production.....                                                                       | 110,890                                                         | 192,365      | -81,475                                                        | 324,104                                   | 161,379                                        | 33,274                 |
| Goods production.....                                                                                          | 122,018                                                         | 4,641        | 117,377                                                        | 296,931                                   | --                                             | 10,208                 |
| Distribution and transportation of goods.....                                                                  | 138,634                                                         | 48,368       | 90,267                                                         | 96,297                                    | 79,054                                         | 13,023                 |
| Information.....                                                                                               | --                                                              | --           | --                                                             | --                                        | --                                             | --                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 315,076                                                         | 3,221        | 311,855                                                        | 176,255                                   | --                                             | 47,344                 |
| Services.....                                                                                                  | 618,507                                                         | 32,648       | 585,859                                                        | 329,437                                   | 280,592                                        | 26,593                 |
| <b>Belgium</b>                                                                                                 |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 2,841,838                                                       | 408,423      | 2,433,414                                                      | 719,762                                   | 222,619                                        | 1,717,959              |
| Raw materials and energy production.....                                                                       | --                                                              | --           | --                                                             | --                                        | --                                             | --                     |
| Goods production.....                                                                                          | 614,335                                                         | 266,789      | 347,545                                                        | 369,807                                   | 55,026                                         | 126,089                |
| Distribution and transportation of goods.....                                                                  | 33,060                                                          | 43,410       | -10,350                                                        | 44,678                                    | 33,799                                         | 13,998                 |
| Information.....                                                                                               | -80,888                                                         | 214          | -81,102                                                        | 90,765                                    | --                                             | 5,133                  |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 261,373                                                         | 39,643       | 221,730                                                        | 26,717                                    | 989                                            | 113,334                |
| Services.....                                                                                                  | 2,013,958                                                       | 58,367       | 1,955,591                                                      | 187,796                                   | 132,806                                        | 1,459,405              |
| <b>Bermuda</b>                                                                                                 |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 12,442,968                                                      | 1,351,193    | 11,091,775                                                     | 5,250,898                                 | 744,163                                        | 3,293,727              |
| Raw materials and energy production.....                                                                       | 2,578,185                                                       | 739,283      | 1,838,903                                                      | 801,468                                   | 510,866                                        | 24,099                 |
| Goods production.....                                                                                          | 6,449,971                                                       | 288,855      | 6,161,116                                                      | 683,117                                   | 82,132                                         | 914,894                |
| Distribution and transportation of goods.....                                                                  | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Information.....                                                                                               | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 1,920,053                                                       | 112,528      | 1,807,524                                                      | 2,134,225                                 | 5,665                                          | 1,543,048              |
| Services.....                                                                                                  | 1,261,075                                                       | 138,344      | 1,122,731                                                      | 1,279,769                                 | --                                             | 702,804                |
| <b>Brazil</b>                                                                                                  |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 1,505,562                                                       | 953,402      | 552,161                                                        | 2,520,784                                 | 1,273,325                                      | 358,579                |
| Raw materials and energy production.....                                                                       | 67,845                                                          | 118,190      | -50,345                                                        | 124,288                                   | 13,180                                         | 237                    |
| Goods production.....                                                                                          | -25,462                                                         | 342,377      | -367,839                                                       | 782,937                                   | 383,926                                        | 63,754                 |
| Distribution and transportation of goods.....                                                                  | 229,670                                                         | 82,314       | 147,355                                                        | 103,611                                   | 88,383                                         | 18,211                 |
| Information.....                                                                                               | -441,816                                                        | 35,786       | -477,602                                                       | 63,144                                    | 74,742                                         | 29,601                 |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 1,488,586                                                       | 322,992      | 1,165,594                                                      | 866,095                                   | 525,100                                        | 118,718                |
| Services.....                                                                                                  | 186,741                                                         | 51,743       | 134,998                                                        | 580,708                                   | 187,994                                        | 128,057                |

Footnotes at end of table.



# Controlled Foreign Corporations, 2002

**Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued        |              |                                                                |                                           |                                                |                        |
|----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|--------------|----------------------------------------------------------------|-------------------------------------------|------------------------------------------------|------------------------|
|                                                                                                                | Current earnings and profits (less deficit) before income taxes | Income taxes | Current earnings and profits (less deficit) after income taxes | Distributions out of earnings and profits | Dividends paid to controlling U.S. corporation | Total Subpart F income |
|                                                                                                                | (6)                                                             | (7)          | (8)                                                            | (9)                                       | (10)                                           | (11)                   |
| <b>Canada</b>                                                                                                  |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 18,204,275                                                      | 5,059,632    | 13,144,643                                                     | 8,144,729                                 | 3,941,111                                      | 2,122,812              |
| Raw materials and energy production.....                                                                       | 3,361,145                                                       | 888,091      | 2,473,054                                                      | 1,053,274                                 | 773,294                                        | 37,524                 |
| Goods production.....                                                                                          | 7,896,200                                                       | 2,278,472    | 5,617,728                                                      | 4,007,914                                 | 1,908,062                                      | 1,256,032              |
| Distribution and transportation of goods.....                                                                  | 1,313,866                                                       | 502,018      | 811,848                                                        | 462,342                                   | 222,720                                        | 329,653                |
| Information.....                                                                                               | 235,571                                                         | 97,038       | 138,534                                                        | 77,783                                    | 48,896                                         | 26,565                 |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 3,619,278                                                       | 848,742      | 2,770,536                                                      | 892,007                                   | 454,025                                        | 216,921                |
| Services.....                                                                                                  | 1,778,214                                                       | 445,272      | 1,332,942                                                      | 1,651,410                                 | 534,114                                        | 256,117                |
| <b>Cayman Islands (British)</b>                                                                                |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 5,316,569                                                       | 1,493,060    | 3,823,509                                                      | 2,752,978                                 | 308,760                                        | 1,692,970              |
| Raw materials and energy production.....                                                                       | 1,929,101                                                       | 818,121      | 1,110,980                                                      | 286,860                                   | 106,075                                        | 60,505                 |
| Goods production.....                                                                                          | 1,159,014                                                       | 227,667      | 931,347                                                        | 189,872                                   | 54,277                                         | 185,826                |
| Distribution and transportation of goods.....                                                                  | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Information.....                                                                                               | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 753,844                                                         | 321,067      | 432,777                                                        | 904,275                                   | 16,391                                         | 1,153,370              |
| Services.....                                                                                                  | 1,267,713                                                       | 113,124      | 1,154,589                                                      | 1,315,645                                 | 132,017                                        | 231,337                |
| <b>Chile</b>                                                                                                   |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 169,278                                                         | 48,677       | 120,601                                                        | 631,067                                   | 144,915                                        | 80,468                 |
| Raw materials and energy production.....                                                                       | 60,346                                                          | 5,606        | 54,740                                                         | 49,181                                    | 10,202                                         | 4,303                  |
| Goods production.....                                                                                          | 108,631                                                         | 7,914        | 100,717                                                        | 10,343                                    | 10,739                                         | 25,086                 |
| Distribution and transportation of goods.....                                                                  | 37,656                                                          | 2,704        | 34,952                                                         | 6,068                                     | --                                             | 595                    |
| Information.....                                                                                               | -32,337                                                         | 5,285        | -37,622                                                        | 18,002                                    | 17,538                                         | --                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 65,452                                                          | 14,646       | 50,805                                                         | 430,433                                   | 96,889                                         | 11,816                 |
| Services.....                                                                                                  | -70,470                                                         | 12,523       | -82,992                                                        | 117,039                                   | 9,547                                          | 38,668                 |
| <b>Denmark</b>                                                                                                 |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 9,494                                                           | 62,242       | -52,747                                                        | 245,098                                   | 17,475                                         | 55,905                 |
| Raw materials and energy production.....                                                                       | --                                                              | --           | --                                                             | --                                        | --                                             | --                     |
| Goods production.....                                                                                          | -81,681                                                         | 21,402       | -103,083                                                       | 23,787                                    | --                                             | 16,811                 |
| Distribution and transportation of goods.....                                                                  | 25,191                                                          | 11,228       | 13,963                                                         | 22,420                                    | 13,283                                         | 422                    |
| Information.....                                                                                               | --                                                              | --           | --                                                             | --                                        | --                                             | --                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 52,155                                                          | 15,994       | 36,161                                                         | 44,549                                    | 1,448                                          | 36,991                 |
| Services.....                                                                                                  | 13,829                                                          | 13,617       | 212                                                            | 154,342                                   | 2,744                                          | 1,681                  |
| <b>France (including Andorra and Corsica)</b>                                                                  |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 5,720,686                                                       | 1,320,288    | 4,400,398                                                      | 2,865,644                                 | 734,608                                        | 633,858                |
| Raw materials and energy production.....                                                                       | 50,150                                                          | 22,604       | 27,546                                                         | --                                        | --                                             | 21,602                 |
| Goods production.....                                                                                          | 1,975,080                                                       | 638,973      | 1,336,106                                                      | 924,597                                   | 349,800                                        | 167,969                |
| Distribution and transportation of goods.....                                                                  | 1,105,747                                                       | 290,060      | 815,688                                                        | 403,189                                   | 78,584                                         | 13,974                 |
| Information.....                                                                                               | 255,222                                                         | 11,903       | 243,318                                                        | 12,474                                    | --                                             | 210,871                |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 1,022,924                                                       | 156,172      | 866,751                                                        | 103,104                                   | 7,327                                          | 148,454                |
| Services.....                                                                                                  | 1,311,564                                                       | 200,576      | 1,110,988                                                      | 1,422,279                                 | 298,898                                        | 70,989                 |
| <b>Germany</b>                                                                                                 |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 6,427,139                                                       | 1,802,957    | 4,624,183                                                      | 3,662,523                                 | 660,630                                        | 615,815                |
| Raw materials and energy production.....                                                                       | --                                                              | --           | --                                                             | --                                        | --                                             | --                     |
| Goods production.....                                                                                          | 1,954,757                                                       | 701,704      | 1,253,053                                                      | 1,062,623                                 | 193,040                                        | 151,452                |
| Distribution and transportation of goods.....                                                                  | 648,061                                                         | 164,413      | 483,648                                                        | 310,359                                   | 155,070                                        | 142,069                |
| Information.....                                                                                               | 773,413                                                         | 228,472      | 544,941                                                        | 94,617                                    | 38,075                                         | 5,582                  |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 1,213,558                                                       | 404,407      | 809,151                                                        | 1,169,553                                 | 126,599                                        | 50,624                 |
| Services.....                                                                                                  | 1,837,351                                                       | 303,962      | 1,533,389                                                      | 1,025,370                                 | 147,846                                        | 266,088                |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

**Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued        |              |                                                                |                                           |                                                |                        |
|----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|--------------|----------------------------------------------------------------|-------------------------------------------|------------------------------------------------|------------------------|
|                                                                                                                | Current earnings and profits (less deficit) before income taxes | Income taxes | Current earnings and profits (less deficit) after income taxes | Distributions out of earnings and profits | Dividends paid to controlling U.S. corporation | Total Subpart F income |
|                                                                                                                | (6)                                                             | (7)          | (8)                                                            | (9)                                       | (10)                                           | (11)                   |
| <b>Hong Kong</b>                                                                                               |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 3,470,610                                                       | 434,578      | 3,036,032                                                      | 2,068,512                                 | 497,855                                        | 617,222                |
| Raw materials and energy production.....                                                                       | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Goods production.....                                                                                          | 13,029                                                          | 37,178       | -24,150                                                        | 347,352                                   | 145,214                                        | 68,151                 |
| Distribution and transportation of goods.....                                                                  | 629,626                                                         | 97,256       | 532,371                                                        | 396,408                                   | 15,229                                         | 282,804                |
| Information.....                                                                                               | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 1,254,093                                                       | 179,033      | 1,075,060                                                      | 181,483                                   | 44,887                                         | 78,007                 |
| Services.....                                                                                                  | 1,039,995                                                       | 36,240       | 1,003,755                                                      | 709,872                                   | 287,356                                        | 179,059                |
| <b>Ireland</b>                                                                                                 |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 14,681,537                                                      | 791,968      | 13,889,569                                                     | 4,932,475                                 | 659,405                                        | 1,842,006              |
| Raw materials and energy production.....                                                                       | --                                                              | --           | --                                                             | --                                        | --                                             | --                     |
| Goods production.....                                                                                          | 8,008,003                                                       | 449,618      | 7,558,384                                                      | 2,151,484                                 | 622,745                                        | 558,027                |
| Distribution and transportation of goods.....                                                                  | 677,147                                                         | 34,576       | 642,571                                                        | 88,512                                    | --                                             | 70,034                 |
| Information.....                                                                                               | 1,007,972                                                       | 112,189      | 895,782                                                        | 25,787                                    | --                                             | 82,670                 |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 904,865                                                         | 145,879      | 758,986                                                        | 651,013                                   | 1,562                                          | 266,094                |
| Services.....                                                                                                  | 4,083,550                                                       | 49,705       | 4,033,845                                                      | 2,015,679                                 | 35,098                                         | 865,180                |
| <b>Italy (including San Marino)</b>                                                                            |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 3,891,996                                                       | 1,181,592    | 2,710,404                                                      | 1,866,238                                 | 329,740                                        | 538,723                |
| Raw materials and energy production.....                                                                       | --                                                              | --           | --                                                             | --                                        | --                                             | --                     |
| Goods production.....                                                                                          | 2,277,184                                                       | 777,755      | 1,499,428                                                      | 1,077,749                                 | 252,813                                        | 212,764                |
| Distribution and transportation of goods.....                                                                  | 778,155                                                         | 232,497      | 545,657                                                        | 602,950                                   | 44,580                                         | 160,756                |
| Information.....                                                                                               | 139,476                                                         | 11,707       | 127,769                                                        | --                                        | --                                             | 108,781                |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 153,094                                                         | 64,125       | 88,969                                                         | 8,634                                     | 6,209                                          | 8,578                  |
| Services.....                                                                                                  | 544,088                                                         | 95,508       | 448,580                                                        | 176,904                                   | 26,139                                         | 47,845                 |
| <b>Japan (including Okinawa and Ryukyu Islands)</b>                                                            |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 12,143,026                                                      | 3,148,301    | 8,994,725                                                      | 4,961,046                                 | 2,403,647                                      | 625,626                |
| Raw materials and energy production.....                                                                       | --                                                              | --           | --                                                             | --                                        | --                                             | --                     |
| Goods production.....                                                                                          | 2,764,094                                                       | 1,242,735    | 1,521,359                                                      | 2,041,500                                 | 843,835                                        | 102,594                |
| Distribution and transportation of goods.....                                                                  | 1,362,499                                                       | 659,400      | 703,100                                                        | 884,052                                   | 234,389                                        | 150,289                |
| Information.....                                                                                               | 281,772                                                         | 119,574      | 162,198                                                        | 189,926                                   | 44,722                                         | --                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 5,775,697                                                       | 477,776      | 5,297,921                                                      | 37,350                                    | 21,128                                         | 302,193                |
| Services.....                                                                                                  | 1,958,964                                                       | 648,817      | 1,310,147                                                      | 1,808,218                                 | 1,259,574                                      | 70,550                 |
| <b>Luxembourg</b>                                                                                              |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 5,084,975                                                       | 377,167      | 4,707,808                                                      | 3,940,717                                 | 1,293,224                                      | 1,172,756              |
| Raw materials and energy production.....                                                                       | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Goods production.....                                                                                          | 1,190,593                                                       | 178,398      | 1,012,195                                                      | 747,987                                   | 74,672                                         | 110,142                |
| Distribution and transportation of goods.....                                                                  | 2,252,878                                                       | 48,316       | 2,204,562                                                      | 2,139,633                                 | 1,129,614                                      | 775,029                |
| Information.....                                                                                               | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 347,344                                                         | 61,528       | 285,815                                                        | 26,321                                    | 318                                            | 39,557                 |
| Services.....                                                                                                  | 1,522,461                                                       | 71,593       | 1,450,868                                                      | 943,992                                   | 5,836                                          | 248,028                |
| <b>Malaysia</b>                                                                                                |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 1,230,857                                                       | 80,421       | 1,150,436                                                      | 1,463,171                                 | 1,076,402                                      | 314,160                |
| Raw materials and energy production.....                                                                       | --                                                              | --           | --                                                             | --                                        | --                                             | --                     |
| Goods production.....                                                                                          | 1,048,868                                                       | 27,490       | 1,021,378                                                      | 1,347,869                                 | 994,396                                        | 309,063                |
| Distribution and transportation of goods.....                                                                  | 8,843                                                           | 3,003        | 5,840                                                          | 25,789                                    | 25,813                                         | 1,656                  |
| Information.....                                                                                               | --                                                              | --           | --                                                             | --                                        | --                                             | --                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 149,435                                                         | 49,569       | 99,866                                                         | 64,013                                    | 56,193                                         | 882                    |
| Services.....                                                                                                  | 23,710                                                          | 359          | 23,351                                                         | 25,500                                    | --                                             | 2,560                  |
| <b>Mexico</b>                                                                                                  |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 7,439,151                                                       | 1,883,829    | 5,555,322                                                      | 1,688,222                                 | 583,238                                        | 539,006                |
| Raw materials and energy production.....                                                                       | 189,298                                                         | -687         | 189,986                                                        | 10,369                                    | 10,449                                         | 40,119                 |
| Goods production.....                                                                                          | 3,467,861                                                       | 954,732      | 2,513,129                                                      | 805,242                                   | 253,998                                        | 347,182                |
| Distribution and transportation of goods.....                                                                  | 1,229,851                                                       | 363,756      | 866,096                                                        | 403,103                                   | 20,384                                         | 26,273                 |
| Information.....                                                                                               | -164,347                                                        | --           | -164,347                                                       | --                                        | --                                             | 20,288                 |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 2,045,884                                                       | 389,637      | 1,656,247                                                      | 238,558                                   | 167,396                                        | 68,491                 |
| Services.....                                                                                                  | 670,603                                                         | 176,391      | 494,212                                                        | 230,950                                   | 131,011                                        | 36,652                 |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

**Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued        |              |                                                                |                                           |                                                |                        |
|----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|--------------|----------------------------------------------------------------|-------------------------------------------|------------------------------------------------|------------------------|
|                                                                                                                | Current earnings and profits (less deficit) before income taxes | Income taxes | Current earnings and profits (less deficit) after income taxes | Distributions out of earnings and profits | Dividends paid to controlling U.S. corporation | Total Subpart F income |
|                                                                                                                | (6)                                                             | (7)          | (8)                                                            | (9)                                       | (10)                                           | (11)                   |
| <b>Netherlands</b>                                                                                             |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 32,587,033                                                      | 5,196,951    | 27,390,082                                                     | 10,433,285                                | 1,404,933                                      | 3,098,938              |
| Raw materials and energy production.....                                                                       | 2,974,008                                                       | 981,957      | 1,992,050                                                      | 1,599,116                                 | --                                             | 103,814                |
| Goods production.....                                                                                          | 19,489,908                                                      | 2,608,528    | 16,881,380                                                     | 4,944,186                                 | 1,061,919                                      | 1,115,755              |
| Distribution and transportation of goods.....                                                                  | 2,777,867                                                       | 581,396      | 2,196,471                                                      | 1,830,271                                 | 59,555                                         | 302,903                |
| Information.....                                                                                               | 476,159                                                         | 158,219      | 317,940                                                        | 15,000                                    | --                                             | 218,443                |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 2,404,028                                                       | 319,024      | 2,085,003                                                      | 533,028                                   | --                                             | 683,274                |
| Services.....                                                                                                  | 4,465,063                                                       | 547,826      | 3,917,237                                                      | 1,511,684                                 | 283,458                                        | 674,749                |
| <b>New Zealand</b>                                                                                             |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 612,218                                                         | 94,280       | 517,938                                                        | 276,983                                   | 6,796                                          | 254,655                |
| Raw materials and energy production.....                                                                       | 225,743                                                         | 33,358       | 192,385                                                        | 174,300                                   | --                                             | 1,928                  |
| Goods production.....                                                                                          | -15,660                                                         | 22,443       | -38,103                                                        | 808                                       | --                                             | 1,146                  |
| Distribution and transportation of goods.....                                                                  | 44,079                                                          | 10,071       | 34,007                                                         | 604                                       | --                                             | 742                    |
| Information.....                                                                                               | --                                                              | --           | --                                                             | --                                        | --                                             | --                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 193,670                                                         | 29,240       | 164,430                                                        | 67,122                                    | 6,796                                          | 106,055                |
| Services.....                                                                                                  | 164,386                                                         | -832         | 165,218                                                        | 34,149                                    | --                                             | 144,785                |
| <b>Norway</b>                                                                                                  |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 552,623                                                         | 273,855      | 278,768                                                        | 152,095                                   | 113,534                                        | 43,073                 |
| Raw materials and energy production.....                                                                       | 394,075                                                         | 226,341      | 167,734                                                        | 125,249                                   | 110,132                                        | 4,499                  |
| Goods production.....                                                                                          | 119,546                                                         | 28,356       | 91,190                                                         | 2,195                                     | --                                             | 1,967                  |
| Distribution and transportation of goods.....                                                                  | 28,230                                                          | 12,981       | 15,249                                                         | 8,532                                     | 3,402                                          | 7,163                  |
| Information.....                                                                                               | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Services.....                                                                                                  | 40,093                                                          | 4,078        | 36,015                                                         | 16,119                                    | --                                             | 27,097                 |
| <b>Philippines</b>                                                                                             |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 898,411                                                         | 111,396      | 787,015                                                        | 284,660                                   | 54,235                                         | 31,627                 |
| Raw materials and energy production.....                                                                       | 407,842                                                         | 56,647       | 351,195                                                        | 184,346                                   | --                                             | 2,910                  |
| Goods production.....                                                                                          | 228,719                                                         | 37,870       | 190,849                                                        | 55,029                                    | 45,022                                         | 2,964                  |
| Distribution and transportation of goods.....                                                                  | --                                                              | --           | --                                                             | --                                        | --                                             | --                     |
| Information.....                                                                                               | --                                                              | --           | --                                                             | --                                        | --                                             | --                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 223,822                                                         | 15,718       | 208,104                                                        | 45,150                                    | 9,213                                          | 22,118                 |
| Services.....                                                                                                  | 38,028                                                          | 1,161        | 36,867                                                         | 136                                       | --                                             | 3,634                  |
| <b>Singapore</b>                                                                                               |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 2,352,902                                                       | 260,785      | 2,092,117                                                      | 2,518,016                                 | 1,253,685                                      | 1,100,222              |
| Raw materials and energy production.....                                                                       | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Goods production.....                                                                                          | 899,403                                                         | 89,106       | 810,298                                                        | 1,206,229                                 | 290,039                                        | 920,902                |
| Distribution and transportation of goods.....                                                                  | 396,582                                                         | 58,409       | 338,174                                                        | 37,248                                    | --                                             | 95,666                 |
| Information.....                                                                                               | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 115,091                                                         | 34,872       | 80,219                                                         | 97,235                                    | --                                             | 13,009                 |
| Services.....                                                                                                  | 929,659                                                         | 71,237       | 858,422                                                        | 1,159,647                                 | 960,572                                        | 70,645                 |
| <b>South Korea, Republic of</b>                                                                                |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 2,004,694                                                       | 581,755      | 1,422,939                                                      | 570,638                                   | 364,355                                        | 104,194                |
| Raw materials and energy production.....                                                                       | 93,014                                                          | 7,437        | 85,577                                                         | 47,108                                    | 29,853                                         | 913                    |
| Goods production.....                                                                                          | 1,184,389                                                       | 289,927      | 894,462                                                        | 250,942                                   | 110,675                                        | 39,389                 |
| Distribution and transportation of goods.....                                                                  | 360,335                                                         | 133,184      | 227,152                                                        | 176,287                                   | 150,708                                        | 19,281                 |
| Information.....                                                                                               | 141,234                                                         | 51,260       | 89,974                                                         | 71,118                                    | 71,050                                         | 1,186                  |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 137,813                                                         | 32,847       | 104,967                                                        | 2,241                                     | 2,069                                          | 42,282                 |
| Services.....                                                                                                  | 87,909                                                          | 67,101       | 20,808                                                         | 22,941                                    | --                                             | 1,143                  |
| <b>Spain</b>                                                                                                   |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 3,619,873                                                       | 1,388,715    | 2,231,157                                                      | 2,097,871                                 | 765,841                                        | 583,313                |
| Raw materials and energy production.....                                                                       | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Goods production.....                                                                                          | 1,341,523                                                       | 336,772      | 1,004,751                                                      | 684,062                                   | 112,396                                        | 514,294                |
| Distribution and transportation of goods.....                                                                  | 1,510,805                                                       | 895,047      | 615,758                                                        | 563,929                                   | 232,016                                        | 54,557                 |
| Information.....                                                                                               | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 260,502                                                         | 36,400       | 224,102                                                        | 437,850                                   | 80,491                                         | 6,793                  |
| Services.....                                                                                                  | 424,940                                                         | 108,482      | 316,458                                                        | 404,998                                   | 334,032                                        | 7,333                  |

Footnotes at end of table.

# Controlled Foreign Corporations, 2002

**Table 3.--U.S. Corporations with Total Assets of \$500 Million or More and Their 7,500 Largest Controlled Foreign Corporations: Number, Assets, Receipts, Earnings, Taxes, Distributions, and Subpart F Income, by Selected Country of Incorporation and North American Industry Classification System (NAICS) Industrial Sector of Controlled Foreign Corporation--Continued**

[Money amounts are in thousands of dollars]

| Selected country of incorporation and NAICS industrial sector of 7,500 largest Controlled Foreign Corporations | 7,500 largest Controlled Foreign Corporations--Continued        |              |                                                                |                                           |                                                |                        |
|----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|--------------|----------------------------------------------------------------|-------------------------------------------|------------------------------------------------|------------------------|
|                                                                                                                | Current earnings and profits (less deficit) before income taxes | Income taxes | Current earnings and profits (less deficit) after income taxes | Distributions out of earnings and profits | Dividends paid to controlling U.S. corporation | Total Subpart F income |
|                                                                                                                | (6)                                                             | (7)          | (8)                                                            | (9)                                       | (10)                                           | (11)                   |
| <b>Sweden</b>                                                                                                  |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 994,089                                                         | 249,963      | 744,126                                                        | 1,032,679                                 | 109,970                                        | 729,914                |
| Raw materials and energy production.....                                                                       | --                                                              | --           | --                                                             | --                                        | --                                             | --                     |
| Goods production.....                                                                                          | -340,920                                                        | 48,421       | -389,341                                                       | 67,775                                    | --                                             | 5,044                  |
| Distribution and transportation of goods.....                                                                  | 896,327                                                         | 89,837       | 806,491                                                        | 915,316                                   | 108,383                                        | 609,136                |
| Information.....                                                                                               | 283,269                                                         | 58,014       | 225,256                                                        | --                                        | --                                             | 39,699                 |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 443,664                                                         | 37,539       | 406,126                                                        | 2,534                                     | 1,587                                          | 18,054                 |
| Services.....                                                                                                  | -288,252                                                        | 16,153       | -304,406                                                       | 47,054                                    | --                                             | 57,980                 |
| <b>Switzerland</b>                                                                                             |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 14,455,517                                                      | 1,017,479    | 13,438,039                                                     | 5,562,265                                 | 1,184,452                                      | 2,135,910              |
| Raw materials and energy production.....                                                                       | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Goods production.....                                                                                          | 6,834,656                                                       | 465,863      | 6,368,793                                                      | 2,076,456                                 | 609,324                                        | 975,418                |
| Distribution and transportation of goods.....                                                                  | 2,748,687                                                       | 195,354      | 2,553,333                                                      | 1,141,066                                 | 379,960                                        | 430,114                |
| Information.....                                                                                               | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 814,666                                                         | 133,346      | 681,320                                                        | 363,599                                   | 21,356                                         | 145,641                |
| Services.....                                                                                                  | 4,456,535                                                       | 217,009      | 4,239,526                                                      | 1,981,144                                 | 173,812                                        | 556,797                |
| <b>United Kingdom</b>                                                                                          |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 20,674,228                                                      | 4,804,193    | 15,870,035                                                     | 15,612,317                                | 3,484,464                                      | 3,755,212              |
| Raw materials and energy production.....                                                                       | 3,808,716                                                       | 996,487      | 2,812,229                                                      | 1,932,217                                 | 592,698                                        | 615,013                |
| Goods production.....                                                                                          | 3,507,056                                                       | 970,138      | 2,536,918                                                      | 2,221,324                                 | 341,259                                        | 707,097                |
| Distribution and transportation of goods.....                                                                  | 1,880,286                                                       | 354,947      | 1,525,338                                                      | 559,394                                   | 209,157                                        | 89,349                 |
| Information.....                                                                                               | -6,570,560                                                      | 128,550      | -6,699,110                                                     | 225,681                                   | 110,373                                        | 230,275                |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 8,927,112                                                       | 1,538,754    | 7,388,357                                                      | 3,791,675                                 | 214,508                                        | 1,289,568              |
| Services.....                                                                                                  | 9,121,618                                                       | 815,316      | 8,306,302                                                      | 6,882,027                                 | 2,016,469                                      | 823,911                |
| <b>Venezuela</b>                                                                                               |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 749,223                                                         | 154,938      | 594,284                                                        | 634,344                                   | 75,362                                         | 15,032                 |
| Raw materials and energy production.....                                                                       | 110,380                                                         | 15,637       | 94,743                                                         | 117,665                                   | 28,744                                         | 4,274                  |
| Goods production.....                                                                                          | 389,620                                                         | 32,875       | 356,746                                                        | 323,697                                   | 33,816                                         | 3,964                  |
| Distribution and transportation of goods.....                                                                  | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Information.....                                                                                               | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 107,235                                                         | 2,859        | 104,376                                                        | --                                        | --                                             | --                     |
| Services.....                                                                                                  | -67,496                                                         | 24,295       | -91,791                                                        | 28,046                                    | 12,802                                         | 6,368                  |
| <b>European Union, total (some countries included above)</b>                                                   |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 98,573,292                                                      | 17,989,102   | 80,584,191                                                     | 48,395,918                                | 10,048,887                                     | 15,778,476             |
| Raw materials and energy production.....                                                                       | 6,900,838                                                       | 2,023,895    | 4,876,943                                                      | 3,614,117                                 | 675,481                                        | 740,764                |
| Goods production.....                                                                                          | 40,591,239                                                      | 7,140,570    | 33,450,669                                                     | 14,378,148                                | 3,080,225                                      | 3,728,672              |
| Distribution and transportation of goods.....                                                                  | 12,899,211                                                      | 2,810,948    | 10,088,263                                                     | 7,505,520                                 | 2,068,747                                      | 2,322,916              |
| Information.....                                                                                               | -3,732,223                                                      | 768,345      | -4,500,568                                                     | 485,509                                   | 155,354                                        | 901,454                |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 15,954,212                                                      | 2,843,103    | 13,111,109                                                     | 6,803,893                                 | 445,888                                        | 2,701,761              |
| Services.....                                                                                                  | 25,960,015                                                      | 2,402,240    | 23,557,776                                                     | 15,608,731                                | 3,623,191                                      | 5,382,908              |
| <b>European Monetary Union, total (some countries included above)</b>                                          |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 76,895,482                                                      | 12,872,704   | 64,022,778                                                     | 31,505,823                                | 6,436,978                                      | 11,237,445             |
| Raw materials and energy production.....                                                                       | 3,092,122                                                       | 1,027,408    | 2,064,714                                                      | 1,681,900                                 | 82,784                                         | 125,752                |
| Goods production.....                                                                                          | 37,506,784                                                      | 6,100,609    | 31,406,175                                                     | 12,065,262                                | 2,738,966                                      | 2,999,720              |
| Distribution and transportation of goods.....                                                                  | 10,097,406                                                      | 2,354,936    | 7,742,471                                                      | 6,008,390                                 | 1,737,924                                      | 1,624,009              |
| Information.....                                                                                               | 2,555,068                                                       | 581,782      | 1,973,286                                                      | 259,828                                   | 44,981                                         | 631,480                |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 6,531,281                                                       | 1,250,816    | 5,280,465                                                      | 2,965,135                                 | 228,345                                        | 1,357,148              |
| Services.....                                                                                                  | 17,112,821                                                      | 1,557,153    | 15,555,668                                                     | 8,525,309                                 | 1,603,978                                      | 4,499,336              |
| <b>OPEC countries, total (some countries included above)</b>                                                   |                                                                 |              |                                                                |                                           |                                                |                        |
| All industries.....                                                                                            | 1,710,127                                                       | 485,447      | 1,224,680                                                      | 1,193,698                                 | 187,039                                        | 18,148                 |
| Raw materials and energy production.....                                                                       | 852,334                                                         | 298,603      | 553,731                                                        | 605,317                                   | 115,079                                        | 4,274                  |
| Goods production.....                                                                                          | 446,824                                                         | 44,345       | 402,479                                                        | 338,604                                   | 33,816                                         | 4,951                  |
| Distribution and transportation of goods.....                                                                  | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Information.....                                                                                               | **                                                              | **           | **                                                             | **                                        | **                                             | **                     |
| Finance, insurance, real estate, and rental and leasing.....                                                   | 231,468                                                         | 31,801       | 199,667                                                        | 40,037                                    | 19,426                                         | 2,129                  |
| Services.....                                                                                                  | -67,496                                                         | 24,295       | -91,791                                                        | 28,046                                    | 12,802                                         | 6,368                  |

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

<sup>1</sup> Number of returns is not additive because some U.S. corporations had Controlled Foreign Corporations in more than one industrial sector. The industrial activity of the parent corporation filing the return often differs from the Controlled Foreign Corporations.

NOTE: Detail may not add to totals because of rounding and because data are shown for selected countries only.