U.S. Corporation Income Tax Returns with a Foreign Tax Credit, Tax Year 2015

U.S. and Foreign-Source Income and Taxes, Foreign Tax Credit, Industry Share of Foreign Tax Credit, by Major and Selected Minor Industry

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

Major and selected minor industry	Number of returns	Income subject to U.S. tax	U.S. income tax before credits	Foreign-source taxable income less loss, after adjustments [1]	Current-year foreign taxes	Foreign tax credit	Industry's share of foreign tax credit [2]
All industries	7,654				\$213,696,157	\$110,210,391	100.0%
Mining	59	\$25,578,613	\$8,961,601	\$24,512,180	\$11,294,622	\$8,507,611	7.7%
Oil and gas extraction, coal mining	39	\$24,284,018	\$8,498,955	\$23,717,917	\$9,758,220	\$8,276,836	7.5%
All other mining	20	\$1,294,595	\$462,645		\$1,536,402	\$230,775	0.2%
Construction	345 1,167	\$2,710,087 \$417,078,207	\$945,605 \$146,401,668		\$963,014 \$106,222,214	\$605,190 \$58,252,405	0.5%
Manufacturing Food manufacturing	56	\$417,978,397 \$17,347,869	\$146,401,668 \$6,071,856	\$217,814,341 \$6,410,682	\$106,322,314 \$2,108,803	\$1,944,775	52.9% 1.8%
5	14	\$27,423,581	\$9,609,493	\$6,475,594	\$2,042,149	\$1,665,787	
Beverage and tobacco products	17	\$261,457	\$90,998	40,473,394 d	\$48,314	\$1,003,787	1.5% 0.0%
Textile mills and textile product mills	29	\$8,230,401	\$2,880,062	\$4,000,657	\$1,306,598	\$1,152,860	1.0%
Paper manufacturing	9	\$642,090	\$224,428		\$65,250	\$36,456	0.0%
Printing and related support activities	14	\$53,750,371	\$18,812,619		\$38,303,369	\$16,315,420	
Petroleum and coal products manufacturing	181	\$95,342,248			\$18,043,687	\$12,742,395	14.8% 11.6%
Chemical manufacturing Pharmaceutical and medicine manufacturing	36	\$53,254,652	\$18,638,920	\$32,425,411	\$10,443,072	\$6,609,813	6.0%
Other chemical manufacturing	145	\$42,087,596	\$14,734,703		\$7,600,615	\$6,132,582	5.6%
•	62	\$3,122,273	\$1,091,285		\$876,968	\$287,331	0.3%
Plastics and rubber products manufacturing	21	\$2,393,267	\$837,003		\$1,472,594	\$456,530	0.3%
Nonmetallic mineral product manufacturing Primary metal manufacturing	33	\$2,393,267 \$1,327,663	\$465,306		\$1,472,594 \$85,881	\$35,253	0.4%
	93	\$5,858,666	\$405,300		\$909,229	\$314,361	0.0%
Fabricated metal products	210	\$23,817,561	\$2,047,938		\$909,229 \$5,203,695	\$3,442,185	0.3%
Machinery manufacturing							3.1% 5.9%
Computer and electronic product manufacturing	154	\$65,768,364	\$23,019,775		\$10,694,245	\$6,454,408	
Electrical equipment, appliance and component manufacturing	57 93	\$47,368,204 \$52,804,036	\$16,595,753 \$18,562,474	\$27,256,690 \$17,395,647	\$7,237,434 \$15,216,432	\$6,715,166 \$4,612,597	6.1% 4.2%
Transportation equipment manufacturing	63	\$15,822,057	\$5,614,372		\$14,394,649	\$3,806,734	4.2%
Motor vehicles and related manufacturing	30	\$36,981,979	\$12,948,102		\$821,783	\$805,864	3.5% 0.7%
Other transportation equipment manufacturing							0.7%
Miscellaneous manufacturing and manufacturing not allocable Wholesale and retail trade	124	\$12,520,346	\$4,384,066	\$7,072,466	\$2,707,666	\$2,068,165	4.9%
Wholesale and retail trade	960 761	\$112,062,893 \$57,675,989	\$39,272,409 \$20,244,846		\$11,285,639 \$5,344,022	\$5,410,375 \$2,558,972	4.9%
	551	\$16,093,359	\$5,624,676		\$2,151,711	\$685,381	0.6%
Durable goods Machinery, equipment, and supplies	149	\$1,948,119	\$678,897	\$203,330	\$94,997	\$45,145	0.0%
Other miscellaneous durable goods	401	\$14,145,240	\$4,945,779	\$3,305,462	\$2,056,714	\$640,235	0.6%
Nondurable goods	210	\$41,582,630	\$14,620,169	\$10,339,256	\$3,192,310	\$1,873,591	1.7%
Drugs, chemicals, and allied products	48	\$15,084,093	\$5,308,842		\$519,479	\$407,823	0.4%
Groceries and related products	22	\$16,252,491	\$5,687,812		\$434,690	\$433,850	0.4%
Other miscellaneous nondurable goods	140	\$10,246,046	\$3,623,515		\$2,238,142	\$1,031,917	0.4%
Retail trade	199	\$54,386,904	\$19,027,563		\$5,941,617	\$2,851,403	2.6%
Food and beverages stores	16	\$3,534,231	\$1,236,706		\$20,305	\$15,990	0.0%
Apparel and accessory stores	55	\$8,628,560	\$3,019,358		\$138,008	\$130,920	0.1%
Miscellaneous retail trade	128	\$42,224,114	\$14,771,500	\$8,579,121	\$5,783,303	\$2,704,493	2.5%
Transportation and warehousing	105	\$21,246,876	\$7,436,165		\$1,027,684	\$1,000,837	0.9%
Information	798	\$86,052,563	\$30,132,067	\$22,356,389	\$8,304,189	\$5,136,343	4.7%
Publishing (except internet)	99	\$22,491,237	\$7,870,512		\$3,929,748	\$2,529,800	2.3%
Motion picture, and sound recording	570	\$6,721,385	\$2,353,187	\$2,588,359	\$1,208,564	\$874,748	0.8%
Broadcasting, internet publishing	27	\$14,359,035			\$755,662	\$641,947	0.6%
Telecommunications	61	\$31,582,634	\$11,062,731	\$3,910,348	\$1,658,675	\$759,573	0.7%
Other information services	41	\$10,898,273			\$751,541	\$330,276	0.7%
Finance, insurance, real estate, and rental and leasing	1,617	\$154,683,716	\$54,491,948		\$21,911,563	\$9,685,733	8.8%
Finance and insurance	1,128	\$150,524,387	\$53,030,411	\$40,495,150	\$21,140,600	\$9,243,286	8.4%
Nondepository credit intermediation	42	\$30,728,181	\$10,754,691		\$2,990,849	\$1,757,153	1.6%
Securities, commodity contracts, and other	114	\$28,470,977	\$9,982,416		\$4,880,173	\$2,662,888	2.4%
Insurance and related activities	925	\$90,026,693	\$31,827,723		\$13,254,431	\$4,811,369	4.4%
Life insurance	72	\$29,879,533	\$10,630,245	\$17,269,322	\$10,341,901	\$2,841,148	2.6%
Mutual and stock property and casualty insurance companies	825	\$29,879,533 \$56,525,947	\$10,630,245 \$19,930,273		\$1,956,895	\$2,841,148 \$1,184,768	1.1%
All other insurance related activities	28	\$3,621,213	\$1,267,204		\$955,635	\$785,452	0.7%
All other finance industries	48	\$1,298,537	\$465,582		\$15,147	\$11,876	0.7%
Real estate and rental and leasing	489	\$4,159,328	\$1,461,536		\$770,964	\$442,447	0.0%
Services	2,401	\$182,352,115	\$63,835,930	\$69,032,346	\$52,408,089	\$21,555,788	19.6%
Professional, scientific, and technical services	797	\$19,202,389	\$6,715,882		\$3,307,346	\$1,789,831	1.6%
Management of holding companies	761	\$133,951,862	\$46,888,061	\$49,334,104	\$35,058,653	\$15,639,290	14.2%
Administrative and support and waste management and remediation	184	\$4,559,471	\$1,593,520	\$1,248,547	\$457,761	\$326,347	0.3%
Education services, health care, and social assistance	118	\$1,487,619			\$33,465	\$25,303	0.3%
Arts, entertainment, and recreation	360	\$1,308,020			\$156,923	\$105,789	0.0%
Accommodation and food services	74	\$21,537,072	\$7,554,749		\$13,367,139	\$3,656,160	3.3%
Other services	107	\$305,683	\$106,827	\$10,001,098 d	\$26,801	\$13,068	0.0%
	201	\$1,616,554	\$564,356	_	\$179,043	\$56,111	
All other industries	201	φ1,010,004	φJ04,330	a	φ179,043	φ30,111	0.1%

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

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

[1] Adjustments to foreign-source taxable income include allocations of current-year U.S.-source losses and recapture of foreign losses, as well as other adjustments. These adjustments (reported on Schedule J) affect the numerator of the limitation fraction used to compute the foreign tax credit.

[2] Equals each industry's foreign tax credit divided by the total foreign tax credit claimed for all industries.

Note: Details may not add to totals because of rounding.

Source: Internal Revenue Service. SOI Tax Stats - Corporate Foreign Tax Credit. Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2015: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118 Credit, by Major and Selected Minor Industry. January 2020.