

Department of the Treasury
Internal Revenue Service

▶ See separate instructions.
▶ Please type or print.

1991

For calendar year 1991 or other tax year beginning, 1991, and ending, 19....

A Country or U.S. possession of incorporation (see instructions)	Name	C Employer identification number
B Check type of election made: <input type="checkbox"/> FSC <input type="checkbox"/> Small FSC Enter the date the election was made:	Number, street, and room or suite no. (see instructions) City or town, state, ZIP code, or country	D Date incorporated
F Check applicable boxes: (1) <input type="checkbox"/> Initial return (2) <input type="checkbox"/> Final return (3) <input type="checkbox"/> Change in address (4) <input type="checkbox"/> Amended return		E Total assets (see instructions) \$

G Refer to the last page of the instructions and enter the principal:
 (1) Business code number ▶ (2) Business activity ▶ (3) Product or service ▶

H Complete the following for the shareholder (individual, corporation, partnership, trust, or estate) who at the beginning of the FSC tax year was the principal shareholder. If two or more shareholders owned equal amounts of stock, enter the information for the shareholder that has the same tax year as the tax year of the corporation.

(1) Name		(2) Identifying number	
(3) Address		(4) Total assets (corporations only) \$	
(5) Percentage of voting stock owned	(6) Tax year end (month and year)	(7) Service Center where return was (or will be) filed	(8) Foreign owner? <input type="checkbox"/> Yes <input type="checkbox"/> No

Note: If the FSC is a member of a controlled group of corporations as defined in section 927(d)(4) and the principal shareholder for which information is provided in Items H(1) through H(8) above is not the common parent of the group, complete Items H(9) through H(15) below for the common parent of the group (see instructions).

(9) Name of common parent	(10) Identifying number	(11) Service Center where return was (or will be) filed
(12) Address		
(13) Percentage of voting stock owned	(14) Tax year end (month and year)	(15) Total assets (consolidated, if applicable) \$

I Enter the amount of tax-exempt interest income received or accrued during the tax year . . . \$

J Administrative Pricing Rules:
 (1) Check the appropriate box(es) to indicate the pricing rule(s) used in determining the taxable income on transactions resulting in foreign trading gross receipts:
 (a) 1.83% of foreign trading gross receipts (b) 23% of combined taxable income (c) Marginal costing (d) Section 482 method
 (2) Check here if the FSC and the related supplier(s) have met the payment arrangement requirements of Temporary Regulations section 1.925(a)-1T(b)(2)(ii) and are thereby electing under that regulations section to have met the requirements for use of the administrative pricing rules . . .

Tax Due or Overpayment

1 Total tax (Schedule J, line 8)			1
2 Payments:			
a 1990 overpayment credited to 1991	2a		
b 1991 estimated tax payments	2b		
c Less 1991 refund applied for on Form 4466	2c	()	
d Bal ▶	2d		
e Tax deposited with Form 7004	2e		
f Credit for Federal tax on fuels (attach Form 4136)	2f		
g U.S. income tax paid or withheld at source (attach Form 1042S)	2g		
h Total payments—Add lines 2d through 2g	2h		
3 Enter any penalty for underpayment of estimated tax—check <input type="checkbox"/> if Form 2220 is attached			3
4 Tax due—If the total of lines 1 and 3 is larger than line 2h, enter amount owed			4
5 Overpayment—If line 2h is larger than the total of lines 1 and 3, enter amount overpaid			5
6 Enter amount of line 5 you want: Credited to 1992 estimated tax ▶			6
	Refunded ▶		

Please Sign Here
Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Paid Preparer's Use Only	Preparer's signature ▶	Date	Check if self-employed <input type="checkbox"/>	Preparer's social security no.
	Firm's name (or yours if self-employed) and address ▶	E.I. No. ▶	ZIP code ▶	

Schedule A Cost of Goods Sold Related to Foreign Trading Gross Receipts (see instructions)

	(a) Using Administrative Pricing Rules		(b) Not Using Administrative Pricing Rules	
1 Inventory at beginning of year	1			
2 Purchases	2			
3 Cost of labor.	3			
4a Additional section 263A costs (see instructions—attach schedule)	4a			
b Other costs (attach schedule)	4b			
5 Total—Add lines 1 through 4b	5			
6 Inventory at end of year	6			
7 Cost of goods sold—Line 5 less line 6. (Enter here and on line 7 of Schedule B. Small FSCs, see instructions for Schedule A.)	7			

8a Check all methods used for valuing closing inventory:

- (i) Cost
- (ii) Lower of cost or market as described in Regulations section 1.471-4 (see instructions)
- (iii) Writedown of "subnormal" goods as described in Regulations section 1.471-2(c) (see instructions)
- (iv) Other (Specify method used and attach explanation.) ▶

b Check if the LIFO inventory method was adopted this tax year for any goods (if checked, attach Form 970).

c If the LIFO inventory method was used for this tax year, enter percentage (or amounts) of closing inventory computed under LIFO **8c** | |

d Do the rules of section 263A (with respect to property produced or acquired for resale) apply to the FSC? . . . Yes No

e Was there any change in determining quantities, cost, or valuations between opening and closing inventory? If "Yes," attach explanation Yes No

Additional Information Required (continued from page 1)

	Yes	No
K Was the FSC at any time during the year engaged in a trade or business in the U.S.?		
L Is the FSC a foreign personal holding company or a personal holding company? (See instructions.)		
M FSC Qualification Requirements:		
(1) Enter the greatest number of shareholders the FSC had at any time during the tax year ▶		
(2) Did the FSC have any preferred stock outstanding at any time during the tax year?		
(3) During the tax year, did the FSC maintain an office, in a "qualifying foreign country" or "U.S. possession" (see instructions), in which a complete set of books and records (including invoices) for the FSC was maintained?		
(4) During the tax year, did the FSC maintain the records required under section 6001 at a location within the U.S.?		
(5) At all times during the tax year, did the FSC have at least one non-U.S. resident on its board of directors?		
(6) At any time during the tax year, was the FSC a member of a controlled group of corporations that included a DISC as a member?		
N Foreign Management Tests. (These requirements do not apply to small FSCs.):		
(1) Did all formally convened meetings of the board of directors and all formally convened meetings of the shareholders take place outside the U.S.?		
(2) Principal bank accounts:		
(a) Were all dividends, legal and accounting fees, salaries of officers, and salaries or fees of members of the board of directors disbursed from bank accounts maintained outside the U.S.? (If so, these accounts are considered to be the FSC's principal bank accounts.)		
(b) At all times during the tax year, did the FSC maintain its principal bank accounts in a "qualifying foreign country" or "U.S. possession"? (See instructions.)		
Bank names ▶		
Account numbers ▶		
O Foreign Economic Process Requirements. (These requirements do not apply to small FSCs.):		
(1) Check the appropriate box below to make an annual election to group the sales activities described under Regulations section 1.924(d)-1(c) on one of the following bases:		
<input type="checkbox"/> customer grouping <input type="checkbox"/> contract grouping <input type="checkbox"/> product or product line grouping <input type="checkbox"/> product or product line subgroupings		
(2) Check one or both boxes below to indicate how the FSC met the "foreign direct costs" requirement:		
<input type="checkbox"/> The FSC (or any person under contract with the FSC) met the 50% test of section 924(d)(1).		
<input type="checkbox"/> The FSC (or any person under contract with the FSC) met the alternative 85% test of section 924(d)(2). Check to indicate the paragraphs of section 924(e) with respect to which this alternative test was satisfied: (1) <input type="checkbox"/> (2) <input type="checkbox"/> (3) <input type="checkbox"/> (4) <input type="checkbox"/> (5) <input type="checkbox"/>		
(3) Check the appropriate box below to make the annual election described in Regulations section 1.924(d)-1(e) to group foreign direct costs on one of the following bases: <input type="checkbox"/> customer grouping <input type="checkbox"/> contract grouping <input type="checkbox"/> product or product line grouping		
P Activities Relating to Disposition of Export Property:		
(1) Check here if the FSC is electing under Regulations section 1.924(e)-1(e)(1) to bear the economic risk of nonpayment of certain commission contracts ▶ <input type="checkbox"/>		
(2) If you checked the box in Item P(1), enter the number of the method (from the five methods listed in Regulations section 1.924(e)-1(e)(1)) that describes how the risk is to be borne by the FSC ▶		

Schedule B Taxable Income or (Loss)

Part I—Income Attributable to Foreign Trade Income

Type of Receipt (see instructions)	(a) Using Administrative Pricing Rules		(b) Not Using Administrative Pricing Rules	
1 Sale, exchange, or other disposition of export property. (Include only 50% of military property sales. Include the other 50% on line 1, Schedule F.)				
2 Lease or rental of export property for use outside the U.S.				
3 Services related and subsidiary to:				
a Sale, exchange, or other disposition of export property. (Include only 50% of services related to the sale or other disposition of military property. Include the other 50% on line 1, Schedule F.)				
b Lease or rental of export property				
4 Engineering or architectural services for construction projects outside the U.S..				
5 Managerial services for an unrelated FSC or DISC. (See instructions for determination of qualifying amount.)				
6 Total Foreign Trading Gross Receipts:				
a Add lines 1 through 5. (Small FSCs must complete lines 6b through 6h.)				
b Small FSC limitation (section 924(b)(2)(B))	\$5,000,000	00		
c Controlled group member's share of line 6b (see instructions)				
d Enter 1 (one) or, in the case of a small FSC having a short tax year, divide the number of days in the short tax year by the number of days that would have comprised a full tax year and enter the resulting fraction as a decimal less than 1.00000 (see instructions)				
e Proration of limitation—Line 6b or line 6c (whichever applies) times line 6d				
f Enter total of columns (a) and (b), line 6a. (If commission income is included on line 6a, see special computation rule in the instructions for line 6f.)				
g Small FSC foreign trading gross receipts that may be taken into account in determining exempt foreign trade income (enter the smaller of line 6e or 6f)				
Note: If line 6f exceeds line 6e, enter the excess on line 7 of Schedule F. See instructions for line 6h if commission income is involved.				
h Allocate the amount from line 6g to columns (a) and (b)—See instructions				
7 Cost of goods sold (Schedule A, line 7). (Small FSCs, enter only the portion of cost of goods sold that is attributable to the receipts on line 6h above—see instructions for Schedule A.)				
8 Foreign trade income—Line 6a or 6h (whichever applies) less line 7				
9a Exemption percentage from line 3d, Schedule E			%	
9b Exemption percentage from line 2d, Schedule E				%
10 Exempt foreign trade income—Multiply line 8 (column (a)) by line 9a and line 8 (column (b)) by line 9b.				
11 Nonexempt foreign trade income—Line 8 less line 10				
12 Enter nonexempt foreign trade income from line 6, Schedule F				
13 Add lines 11 and 12				
14 Enter deductions from line 18, Schedule G, that are attributable to nonexempt foreign trade income				
15 Net income attributable to nonexempt foreign trade income—Line 13 less line 14				

Part II—Taxable Income or (Loss)

16 Taxable income attributable to foreign trade income—Enter total of columns (a) and (b), line 15, reduced by any nontaxable income included in line 15, column (b). Attach a schedule that shows the computation of the taxable portion of line 15, column (b)				
17 Taxable nonforeign trade income from line 19, Schedule F.				
18 Taxable income or (loss) before net operating loss deduction and dividends-received deduction—Add lines 16 and 17.				
19a Net operating loss deduction (see instructions—attach schedule)				
b Dividends-received deduction (see instructions—attach schedule)				
c Add lines 19a and 19b				
20 Taxable income or (loss)—Line 18 less line 19c (enter here and see instructions for Schedule J for figuring the tax on this income).				

Schedule E Percentages To Be Used in Figuring Exempt Foreign Trade Income—Sections 923(a)(2) and (3), and 291(a)(4)

Note: If all shareholders of the FSC are C corporations, enter .30000 on line 2d and .65217 on line 3d and skip all other lines. If all shareholders are other than C corporations, enter .32000 on line 2d and .69565 on line 3d and skip all other lines.

1	Percentage (express as decimal to 5 places) of voting stock owned by shareholders that are C corporations	1	
2	Exemption for foreign trade income determined without regard to administrative pricing rules:		
a	Difference between section 923(a)(2) and section 291(a)(4)(A) percentage	2a	.02000
b	Section 923(a)(2) percentage	2b	.32000
c	Line 2a times line 1	2c	
d	Exemption percentage—Line 2b less line 2c. (Enter here and on line 9b, Schedule B; and on line 16b, Schedule G.)	2d	
3	Exemption percentage for foreign trade income determined under administrative pricing rules:		
a	Difference between section 923(a)(3) fraction and section 291(a)(4)(B) fraction (16/23 - 15/23 = 1/23) expressed as a decimal	3a	.04348
b	Section 923(a)(3) fraction (16/23) expressed as a decimal	3b	.69565
c	Line 3a times line 1	3c	
d	Exemption percentage—Line 3b less line 3c. (Enter here and on line 9a, Schedule B; and on line 16a, Schedule G.)	3d	

Schedule F Nonexempt Foreign Trade Income and Nonforeign Trade Income

Part I—Nonexempt Foreign Trade Income

	(a) Using Administrative Pricing Rules	(b) Not Using Administrative Pricing Rules
1	Enter the remaining 50% of total receipts attributable to the sale, exchange, or other disposition of military property and related services. Note: <i>The first 50% of these receipts was reported on lines 1 and 3a of Schedule B.</i>	
2	International boycott income (see instructions)	
3	Illegal bribes and other payments (see instructions)	
4	Add lines 1, 2, and 3	
5	Enter cost of goods sold and other expenses related to above income (see instructions)	
6	Nonexempt foreign trade income—Line 4 less line 5. (Enter here and on line 12, columns (a) and (b), Schedule B.)	

Part II—Nonforeign Trade Income

7	Small FSCs—If line 6f of Schedule B exceeds line 6e of Schedule B, enter the excess. (Include the deduction for cost of goods sold attributable to the excess on line 18 below.)	7	
8	Interest income	8	
9	Dividend income (attach schedule—see instructions).	9	
10	Carrying charges	10	
11	Royalties	11	
12	Other investment income	12	
13	Receipts excluded under section 924(f) on basis of use, subsidized receipts and receipts from related parties.	13	
14	Income from excluded property under sections 927(a)(2) and (3)	14	
15	Income from transactions that did not qualify as foreign trade income because the “economic process requirements” (see General Instruction C3 for definition) were not met	15	
16	Other income	16	
17	Total—Add lines 7 through 16	17	
18	Enter deductions allocated or apportioned to line 17 income (attach schedule—see instructions)	18	
19	Taxable nonforeign trade income—Line 17 less line 18. (Enter here and on line 17, Schedule B.)	19	

Schedule G Deductions Allocated or Apportioned to Foreign Trade Income (See instructions for limitations on deductions before completing lines 1 through 14.)

	(a) Using Administrative Pricing Rules		(b) Not Using Administrative Pricing Rules	
1 Foreign direct costs:				
a Section 924(e)(1) (advertising and sales promotion)	1a			
b Section 924(e)(2) (certain processing and arranging costs)	1b			
c Section 924(e)(3) (certain transportation costs)	1c			
d Section 924(e)(4) (certain determination and transmittal costs)	1d			
e Section 924(e)(5) (assumption of credit risk)	1e			
f Add lines 1a through 1e	1f			
2 Advertising	2			
3 Interest	3			
4 Depreciation from Form 4562 (less depreciation claimed elsewhere on this return) (attach Form 4562)	4			
5 Salaries and wages	5			
6 Rents	6			
7 Sales commissions	7			
8 Warehousing	8			
9 Freight	9			
10 Compensation of officers	10			
11 Bad debts (see instructions)	11			
12 Pension, profit-sharing, etc., plans	12			
13 Employee benefit programs	13			
14 Other (list): ▶	14			
15 Total (add lines 1f through 14)	15			
16a Exemption percentage from line 3d, Schedule E	16a		%	
b Exemption percentage from line 2d, Schedule E	16b			%
17 Deductions attributable to exempt foreign trade income—Multiply line 15 (column (a)) by line 16a and line 15 (column (b)) by line 16b	17			
18 Total deductions relating to nonexempt foreign trade income—Line 15 less line 17. (Enter here and on line 14, columns (a) and (b), Schedule B.)	18			

Schedule J Tax Computation (see instructions)

1 Check if you are a member of a controlled group (see section 927(d)(4))	▶ <input type="checkbox"/>	
2 If the box on line 1 is checked:		
a Enter your share of the \$50,000 and \$25,000 taxable income bracket amounts (in that order):		
(i) \$ _____	(ii) \$ _____	
b Enter your share of the additional 5% tax (not to exceed \$11,750)	\$ _____	
3 Income tax (see instructions to figure the tax). Check this box if the FSC is a qualified personal service corporation (see instructions) ▶	<input type="checkbox"/>	3
4 Foreign tax credit (see instructions—attach Form 1118)		4
5 Line 3 less line 4		5
6 Personal holding company tax (attach Schedule PH (Form 1120))		6
7a Alternative minimum tax (see instructions—attach Form 4626)		7a
b Environmental tax (see instructions—attach Form 4626)		7b
8 Total tax—Add lines 5 through 7b. Enter here and on line 1, page 1		8

Schedule L Balance Sheets		Beginning of tax year		End of tax year	
		(a)	(b)	(c)	(d)
Assets					
1	Cash				
2a	Trade notes and accounts receivable				
b	Commissions receivable				
c	Less allowance for bad debts				
3	Inventories				
4	U.S. government obligations				
5	Tax-exempt securities (see instructions).				
6	Other current assets (attach schedule)				
7	Loans to stockholders				
8	Mortgage and real estate loans				
9	Other investments (attach schedule)				
10a	Buildings and other depreciable assets				
b	Less accumulated depreciation	()		()	
11a	Depletable assets				
b	Less accumulated depletion	()		()	
12	Land (net of any amortization).				
13a	Intangible assets (amortizable only)				
b	Less accumulated amortization	()		()	
14	Other assets (attach schedule)				
15	Total assets				
Liabilities and Stockholders' Equity					
16	Accounts payable				
17	Mtges., notes, bonds payable in less than 1 year				
18	Transfer prices payable.				
19	Other current liabilities (attach schedule)				
20	Loans from stockholders				
21	Mtges., notes, bonds payable in 1 year or more				
22	Other liabilities (attach schedule)				
23	Capital stock.				
24	Paid-in or capital surplus				
25	Retained earnings—Appropriated (attach schedule)				
26	Retained earnings—Unappropriated				
27	Less cost of treasury stock	()		()	
28	Total liabilities and stockholders' equity				

Schedule M-1 Reconciliation of Income per Books With Income per Return			
1	Net income per books		
2	Federal income tax		
3	Excess of capital losses over capital gains		
4	Income subject to tax not recorded on books this year (itemize):		
5	Expenses recorded on books this year not deducted on this return (itemize):		
a	Depreciation . . . \$		
b	Deductions attributable to exempt foreign trade income \$		
c	Travel and entertainment \$		
6	Total of lines 1 through 5		
7	Income recorded on books this year not included on this return (itemize):		
a	Tax-exempt interest \$		
b	Exempt foreign trade income \$		
8	Deductions on this return not charged against book income this year (itemize):		
a	Depreciation . . . \$		
9	Total of lines 7 and 8		
10	Taxable income (line 20, Schedule B)—line 6 less line 9.		

Schedule M-2 Analysis of Unappropriated Retained Earnings per Books (line 26, Schedule L)			
1	Balance at beginning of year		
2	Net income per books		
3	Other increases (itemize):		
4	Total of lines 1, 2, and 3		
5	Distributions:		
a	Cash		
b	Stock		
c	Property.		
6	Other decreases (itemize):		
7	Total of lines 5a through 6		
8	Balance at end of year (line 4 less line 7)		