David Roose
Director
Bureau of Revenue Estimates

March 2, 2010

Honorable Martin O'Malley
Governor of Maryland
State House
Annapolis, Maryland 21404
Honorable Thomas V. "Mike" Miller, Jr.
President of the Senate
State House
Annapolis, Maryland 21404
Honorable Michael E. Busch
Speaker of the House
State House
Annapolis, Maryland 21404
Dear Governor, President and Speaker:
This report is the second in a series of five annual reports required by Chapter 3 of the 2007 Special Session of the General Assembly, as modified by Chapter 177 of the 2008 Session, on Maryland's corporate income tax and the revenue effects of possible corporate income tax changes. Included in this report are revised estimates of the impact of combined reporting for tax year 2006 and initial estimates for tax year 2007, as well as estimates for two other possible corporate income tax changes.

The estimates for the revenue changes from combined reporting are subject to the same caveats contained in the October 1, 2009 report from the Comptroller:

- these are estimates of the revenue impact for tax years 2006 and 2007 only, not for future years;
- certain assumptions were made regarding the structure and details of the combined reporting-different assumptions could lead to different results;
- it is assumed that the introduction of combined reporting will not affect taxpayer behavior.

In addition, it was apparent that many respondents had misinterpreted the data entry format and provided essentially correct data in an incorrect but logical manner, while others simply made errors. Reports were adjusted for these factors, and for simple typographical errors; in some instances, the respondents were contacted to ensure the accuracy of their reports.

Letter to Honorable Martin O'Malley
Thomas V. "Mike" Miller, Jr., and
Michael E. Busch
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Continuing analysis of tax year 2006 corporate information reports indicates that under the Joyce method of apportionment, combined reporting would have generated approximately \$144 million in additional revenue for that tax year, rather than the initially reported figure of $\$ 109$ million in additional revenue, while under the Finnigan method of apportionment $\$ 197$ million in additional revenue would have been received, rather than the initially reported figure of $\$ 170$ million. This revision arises primarily from three factors-amended corporate reports, additional corporate reports, and the correction of data problems discovered after further detailed analysis. For tax year 2007, revenues would have increased approximately $\$ 92$ million under Joyce, and $\$ 144$ million under Finnigan, increases of roughly $13 \%$ and $20 \%$ over actual tax year 2007 liability.

Tax year 2006 data now show that, under Joyce, the tax liability of manufacturing, retail and finance corporations alone would have been $\$ 145$ million higher, more than the $\$ 144$ million overall increase. For those whose taxes would have been higher under Joyce, corporations in those three industries and the information and accommodation and food services industries would have paid more than $\$ 100,000$ in additional taxes on average. For those whose taxes would have been lower, corporations in the utility, information, management of companies, and health care and social assistance industries would have saved over $\$ 100,000$ on average. The same general pattern holds under Finnigan.

For tax year 2007, manufacturing, retail and finance corporations again would have faced a larger increase in tax liability than the aggregate increase under Joyce, with an additional \$14 million from information corporations. Those four industries also provide more than the entire amount of the increase under Finnigan. In both instances, taxes for utilities would have been lower. The attached tables provide detail by both size of corporate group and by industry, for tax years 2006 and 2007.

The corporate information reporting also allows the estimation of two other potential changes to the corporate income tax-adoption of the throwback rule and $100 \%$ allocation of nonoperational income to Maryland. Corporate income is typically apportioned to the states in which a corporation does business, as measured by some combination of receipts, property and payroll. However, income can be earned in states in which a corporation does not have nexus (generally a state in which sales are made but in which the corporation has no payroll or property), and which is therefore not taxed by that state. The throwback rule brings this "nowhere income" back to the state in which the goods were produced or from which they were shipped.

The tax year 2007 corporate reporting data indicates that 324 entities would have had $\$ 7.8$ billion of income from sales made into states in which they do not have nexus thrown back to Maryland. After apportioning that income and accounting for losses, corporate income tax revenues would have been $\$ 31.3$ million higher, with 181 entities paying higher tax. If sales to the federal government were also thrown back to Maryland, an additional $\$ 2.8$ billion would have been thrown back, and corporate income tax revenues would have increased a further $\$ 17.4$ million. The actual revenue increase had the throwback rule been in effect would have been greater, barring behavioral changes, as single-entity corporations and non-corporate entities were exempt from these reporting requirements.

Letter to Honorable Martin O'Malley
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Generally, income from the regular course of business is apportionable. Certain nonbusiness income, however, is only taxable by the state in which the income-producing assets are managed, usually the state of domicile. This income cannot be taxed by other states. Maryland law, however, apportions away much of this type of non-business income which no other state has the authority to tax. If $100 \%$ of nonoperational income were allocated to Maryland, corporate income tax revenues would have increased at least $\$ 6.4$ million. Again, this increase is probably understated due to the fact that single-entity corporations and non-corporate entities did not fall under these reporting requirements. As nonoperational income results from extraordinary transactions, by definition, it can be expected to be volatile. The estimate for $100 \%$ allocation of nonoperational income for tax year 2006 was $\$ 21.5$ million, demonstrating the volatility.

Next March's report will revise the above estimates for combined reporting, if necessary, along with the initial analysis of tax year 2008 results. To date, there have only been several hundred amended information reports; it is likely that many more will be received for tax years 2006 and 2007 due to net operating loss carrybacks arising from the recession. The Comptroller's Office will remind all respondents of the requirement to amend their information report if the Maryland corporate income tax return of any member of the group is amended. The Comptroller's Office will also continue its analysis of these reports in conjunction with the work of the Maryland Business Tax Reform Commission.

If you have any questions or concerns, please do not hesitate to contact me at 410-260-7450.
Sincerely,


David. F. Roose
Director, Bureau of Revenue Estimates
cc. Comptroller Peter Franchot

Len Foxwell
Linda Tanton

Tax Year 2007 Estimated Impact of Combined Reporting
Joyce Method of Apportionment
By Group Maryland Modified Income

| Group Maryland Modified Income | Winners |  |  | Losers |  |  | No Change \# | Total |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \$ | Average | \# | \$ | Average |  | \# | \$ |
| Non-Taxable | 745 | $(79,079,916)$ | $(106,148)$ | 0 | 0 | 0 | 1,658 | 2,403 | $(79,079,916)$ |
| Under \$500,000 | 212 | $(695,780)$ | $(3,282)$ | 294 | 311,416 | 1,059 | 160 | 666 | $(384,364)$ |
| \$500,000 to \$999,999 | 67 | $(978,362)$ | $(14,602)$ | 83 | 307,812 | 3,709 | 30 | 180 | $(670,550)$ |
| \$1,000,000 to \$4,999,999 | 226 | $(2,320,577)$ | $(10,268)$ | 293 | 2,044,725 | 6,979 | 93 | 612 | $(275,852)$ |
| \$5,000,000 to \$9,999,999 | 137 | $(3,096,060)$ | $(22,599)$ | 172 | 3,660,001 | 21,279 | 32 | 341 | 563,941 |
| \$10,000,000 to \$24,999,999 | 178 | $(7,906,367)$ | $(44,418)$ | 230 | 5,709,476 | 24,824 | 39 | 447 | $(2,196,891)$ |
| \$25,000,000 to \$99,999,999 | 245 | $(21,633,411)$ | $(88,300)$ | 372 | 24,298,969 | 65,320 | 35 | 652 | 2,665,558 |
| \$100,000,000 to \$249,999,999 | 105 | $(24,471,802)$ | $(233,065)$ | 211 | 27,929,182 | 132,366 | 14 | 330 | 3,457,380 |
| \$250,000,000 to \$499,999,999 | 37 | $(6,761,284)$ | $(182,737)$ | 105 | 24,820,756 | 236,388 | 6 | 148 | 18,059,472 |
| \$500,000,000 to \$999,999,999 | 28 | $(8,033,354)$ | $(286,906)$ | 80 | 38,951,199 | 486,890 | $\} 4$ | 272 | 30,917,845 |
| \$1,000,000,000 and Over | 41 | $(27,057,557)$ | $(659,940)$ | 119 | 146,294,107 | 1,229,362 |  | 272 | 119,236,550 |
| Total | 2,021 | $(182,034,470)$ | $(90,071)$ | 1,959 | 274,327,643 | 140,035 | 2,071 | 6,051 | 92,293,173 |

*Brackets indicate consolidation for dislosure purposes.
Bureau of Revenue Estimates
Comptroller of Maryland
March 2, 2010

Tax Year 2007 Estimated Impact of Combined Reporting

## Finnigan Method of Apportionment

By Group Maryland Modified Income

| Group Maryland Modified Income | Winners |  |  | Losers |  |  | $\begin{gathered} \text { No Change } \\ \# \\ \hline \end{gathered}$ | Total |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \$ | Average | \# | \$ | Average |  | \# | \$ |
| Non-Taxable | 745 | $(79,079,916)$ | $(106,148)$ | 0 | 0 | 0 | 1,658 | 2,403 | $(79,079,916)$ |
| Under \$500,000 | 201 | $(690,244)$ | $(3,434)$ | 306 | 330,096 | 1,079 | 159 | 666 | $(360,148)$ |
| \$500,000 to \$999,999 | 64 | $(977,965)$ | $(15,281)$ | 90 | 314,527 | 3,495 | 26 | 180 | $(663,438)$ |
| \$1,000,000 to \$4,999,999 | 212 | $(2,250,536)$ | $(10,616)$ | 317 | 2,121,289 | 6,692 | 83 | 612 | $(129,247)$ |
| \$5,000,000 to \$9,999,999 | 130 | $(3,043,259)$ | $(23,410)$ | 186 | 3,924,507 | 21,100 | 25 | 341 | 881,248 |
| \$10,000,000 to \$24,999,999 | 160 | $(7,772,392)$ | $(48,577)$ | 259 | 6,962,003 | 26,880 | 28 | 447 | $(810,389)$ |
| \$25,000,000 to \$99,999,999 | 213 | $(20,979,998)$ | $(98,498)$ | 410 | 28,240,024 | 68,878 | 29 | 652 | 7,260,026 |
| \$100,000,000 to \$249,999,999 | 82 | $(23,422,086)$ | $(285,635)$ | 236 | 33,081,358 | 140,175 | 12 | 330 | 9,659,272 |
| \$250,000,000 to \$499,999,999 | 31 | $(5,897,868)$ | $(190,254)$ | 113 | 29,173,786 | 258,175 | $\} 6$ | 259 | 23,275,918 |
| \$500,000,000 to \$999,999,999 | 22 | $(7,157,864)$ | $(325,357)$ | 87 | 43,151,634 | 495,996 | 6 | 259 | 35,993,770 |
| \$1,000,000,000 and Over | 34 | $(22,983,831)$ | $(675,995)$ | 127 | 170,597,319 | 1,343,286 | 0 | 161 | 147,613,488 |
| Total | 1,894 | $(174,255,959)$ | $(92,004)$ | 2,131 | 317,896,543 | 149,177 | 2,026 | 6,051 | 143,640,584 |

*Brackets indicate consolidation for dislosure purposes.
Bureau of Revenue Estimates
Comptroller of Maryland
March 2, 2010

## Tax Year 2007 Estimated Impact of Combined Reporting

## Joyce Method of Apportionment

By Predominant Industry, Measured by Payroll, of Group
Industry
Agriculture
Mining
Utilities
Construction
Manufacturing
Wholesale Trade
Retail Trade
Transportation and Warehousing
Information
Finance and Insurance
Real Estate and Rental and Leasing
Professional, Scientific and Technical Services
Management of Companies
Admin. Support, Waste Mgmt., and Remediation Svcs.
Educational Services
Health Care and Social Assistance
Arts, Entertainment, and Recreation
Accommodation and Food Services
Other Services
Misreported
Total

| \# | Winners \$ | Average |
| :---: | :---: | :---: |
| 4 | $(29,505)$ | $(7,376)$ |
| 7 | $(426,090)$ | $(60,870)$ |
| 25 | $(27,124,308)$ | $(1,084,972)$ |
| 90 | $(1,760,715)$ | $(19,564)$ |
| 511 | $(40,204,126)$ | $(78,677)$ |
| 145 | $(8,597,420)$ | $(59,293)$ |
| 97 | $(3,898,247)$ | $(40,188)$ |
| 80 | $(5,139,548)$ | $(64,244)$ |
| 117 | $(12,536,220)$ | $(107,147)$ |
| 205 | $(31,078,561)$ | $(151,603)$ |
| 128 | $(3,156,435)$ | $(24,660)$ |
| 280 | $(21,016,527)$ | $(75,059)$ |
| 95 | $(5,524,147)$ | $(58,149)$ |
| 81 | $(11,946,734)$ | $(147,491)$ |
| 15 | $(1,381,717)$ | $(92,114)$ |
| 52 | $(4,661,862)$ | $(89,651)$ |
| 13 | $(941,004)$ | $(72,385)$ |
| 37 | $(1,480,267)$ | $(40,007)$ |
| 33 | $(593,605)$ | $(17,988)$ |
| 6 | $(537,432)$ | $(89,572)$ |
| 2,021 | $(182,034,470)$ | $(90,071)$ |


| Losers <br> $\#$ |  |  |
| ---: | ---: | ---: |
|  | $\$$ | Average |
| 7 | 41,992 | 5,999 |
| 11 | 234,669 | 21,334 |
| 27 | $1,169,146$ | 43,302 |
| 79 | $2,829,030$ | 35,811 |
|  |  |  |
| 483 | $57,505,605$ | 119,059 |
| 185 | $13,617,599$ | 73,609 |
| 171 | $56,897,748$ | 332,735 |
| 77 | $3,282,240$ | 42,626 |
|  |  |  |
| 90 | $26,869,401$ | 298,549 |
| 169 | $56,928,455$ | 336,855 |
| 100 | $4,403,275$ | 44,033 |
| 256 | $21,213,083$ | 82,864 |
|  |  |  |
| 87 | $12,611,807$ | 144,963 |
| 70 | $4,186,355$ | 59,805 |
| 9 | 131,598 | 14,622 |
| 40 | $3,031,683$ | 75,792 |
|  |  |  |
| 6 | 91,681 | 15,280 |
| 54 | $8,151,013$ | 150,945 |
| 30 | 832,499 | 27,750 |
| 8 | 298,764 | 37,346 |
|  |  |  |
| 1,959 | $274,327,643$ | 140,035 |


| No Change$\#$ | Total |  |
| :---: | :---: | :---: |
|  | \# | \$ |
| 9 | 20 | 12,487 |
| 11 | 29 | $(191,421)$ |
| 31 | 83 | $(25,955,162)$ |
| 91 | 260 | 1,068,315 |
| 424 | 1,418 | 17,301,479 |
| 95 | 425 | 5,020,179 |
| 117 | 385 | 52,999,501 |
| 73 | 230 | $(1,857,308)$ |
| 127 | 334 | 14,333,181 |
| 237 | 611 | 25,849,894 |
| 190 | 418 | 1,246,840 |
| 330 | 866 | 196,556 |
| 89 | 271 | 7,087,660 |
| 55 | 206 | (7,760,379) |
| 14 | 38 | $(1,250,119)$ |
| 70 | 162 | $(1,630,179)$ |
| 19 | 38 | $(849,323)$ |
| 40 | 131 | 6,670,746 |
| 38 | 101 | 238,894 |
| 11 | 25 | $(238,668)$ |
| 2,071 | 6,051 | 92,293,173 |

Tax Year 2007 Estimated Distributional Impact of Combined Reporting Joyce Method of Apportionment
By Predominant Industry, Measured by Payroll, of Group

| Industry | Winners |  | Losers |  | $\begin{gathered} \text { No Change } \\ \# \\ \hline \end{gathered}$ | Total |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \$ | \# | \$ |  | \# | \$ |
| Agriculture | 0.2\% | 0.0\% | 0.4\% | 0.0\% | 0.4\% | 0.3\% | 0.0\% |
| Mining | 0.3\% | 0.2\% | 0.6\% | 0.1\% | 0.5\% | 0.5\% | -0.2\% |
| Utilities | 1.2\% | 14.9\% | 1.4\% | 0.4\% | 1.5\% | 1.4\% | -28.1\% |
| Construction | 4.5\% | 1.0\% | 4.0\% | 1.0\% | 4.4\% | 4.3\% | 1.2\% |
| Manufacturing | 25.3\% | 22.1\% | 24.7\% | 21.0\% | 20.5\% | 23.4\% | 18.7\% |
| Wholesale Trade | 7.2\% | 4.7\% | 9.4\% | 5.0\% | 4.6\% | 7.0\% | 5.4\% |
| Retail Trade | 4.8\% | 2.1\% | 8.7\% | 20.7\% | 5.6\% | 6.4\% | 57.4\% |
| Transportation and Warehousing | 4.0\% | 2.8\% | 3.9\% | 1.2\% | 3.5\% | 3.8\% | -2.0\% |
| Information | 5.8\% | 6.9\% | 4.6\% | 9.8\% | 6.1\% | 5.5\% | 15.5\% |
| Finance and Insurance | 10.1\% | 17.1\% | 8.6\% | 20.8\% | 11.4\% | 10.1\% | 28.0\% |
| Real Estate and Rental and Leasing | 6.3\% | 1.7\% | 5.1\% | 1.6\% | 9.2\% | 6.9\% | 1.4\% |
| Professional, Scientific and Technical Services | 13.9\% | 11.5\% | 13.1\% | 7.7\% | 15.9\% | 14.3\% | 0.2\% |
| Management of Companies | 4.7\% | 3.0\% | 4.4\% | 4.6\% | 4.3\% | 4.5\% | 7.7\% |
| Admin. Support, Waste Mgmt., and Remediation Svcs. | 4.0\% | 6.6\% | 3.6\% | 1.5\% | 2.7\% | 3.4\% | -8.4\% |
| Educational Services | 0.7\% | 0.8\% | 0.5\% | 0.0\% | 0.7\% | 0.6\% | -1.4\% |
| Health Care and Social Assistance | 2.6\% | 2.6\% | 2.0\% | 1.1\% | 3.4\% | 2.7\% | -1.8\% |
| Arts, Entertainment, and Recreation | 0.6\% | 0.5\% | 0.3\% | 0.0\% | 0.9\% | 0.6\% | -0.9\% |
| Accommodation and Food Services | 1.8\% | 0.8\% | 2.8\% | 3.0\% | 1.9\% | 2.2\% | 7.2\% |
| Other Services | 1.6\% | 0.3\% | 1.5\% | 0.3\% | 1.8\% | 1.7\% | 0.3\% |
| Misreported | 0.3\% | 0.3\% | 0.4\% | 0.1\% | 0.5\% | 0.4\% | -0.3\% |
| Total | 100\% | 100.0\% | 100.0\% | 100.0\% | 100.0\% | 100.0\% | 100.0\% |

Bureau of Revenue Estimates
Comptroller of Maryland
March 2, 2010

## Tax Year 2007 Estimated Impact of Combined Reporting

## Finnigan Method of Apportionmen

By Predominant Industry, Measured by Payroll, of Group
Industry
Agriculture
Mining
Utilities
Construction
Manufacturing
Wholesale Trade
Retail Trade
Transportation and Warehousing
Information
Finance and Insurance
Real Estate and Rental and Leasing
Professional, Scientific and Technical Services
Management of Companies
Admin. Support, Waste Mgmt., and Remediation Svcs.
Educational Services
Health Care and Social Assistance
Arts, Entertainment, and Recreation
Accommodation and Food Services
Other Services
Misreported
Total

| Winners |  |  |
| :---: | :---: | :---: |
| \# | \$ | Average |
| 4 | $(29,505)$ | $(7,376)$ |
| 7 | $(425,986)$ | $(60,855)$ |
| 25 | $(27,124,300)$ | $(1,084,972)$ |
| 84 | $(1,708,743)$ | $(20,342)$ |
| 435 | $(36,256,466)$ | $(83,348)$ |
| 81 | $(11,946,734)$ | $(147,491)$ |
| 15 | $(1,381,717)$ | $(92,114)$ |
| 78 | $(4,918,521)$ | $(63,058)$ |
| 113 | $(10,535,020)$ | $(93,230)$ |
| 200 | $(30,611,073)$ | $(153,055)$ |
| 125 | $(3,076,223)$ | $(24,610)$ |
| 274 | $(20,865,064)$ | $(76,150)$ |
| 90 | $(5,440,447)$ | $(60,449)$ |
| 79 | (11,721,066) | $(148,368)$ |
| 15 | $(1,381,717)$ | $(92,114)$ |
| 52 | $(4,635,254)$ | $(89,140)$ |
| 13 | $(941,004)$ | $(72,385)$ |
| 36 | $(1,456,565)$ | $(40,460)$ |
| 31 | $(423,662)$ | $(13,667)$ |
| 6 | $(537,432)$ | $(89,572)$ |
| 1,894 | $(174,255,959)$ | $(92,004)$ |

Losers

No Change

| Total |  |
| ---: | ---: |
| $\$$ <br>  <br> 20$r 12,475$ |  |
| 29 | $(152,002)$ |
| 83 | $(25,928,908)$ |
| 260 | $1,639,464$ |
|  |  |
| 1,418 | $45,438,888$ |
| 425 | $6,141,594$ |
| 385 | $55,001,353$ |
| 230 | $(1,524,647)$ |
|  |  |
| 334 | $20,535,004$ |
| 611 | $31,333,227$ |
| 418 | $1,878,108$ |
| 866 | $3,413,078$ |
|  |  |
| 271 | $9,453,684$ |
| 206 | $(7,039,477)$ |
| 38 | $(1,210,432)$ |
| 162 | $(1,574,464)$ |
|  |  |
| 38 | $(846,899)$ |
| 131 | $6,705,763$ |
| 101 | 603,443 |
| 25 | $(238,668)$ |
|  |  |
| 6,051 | $143,640,584$ |
|  |  |

Tax Year 2007 Estimated Distributional Impact of Combined Reporting Finnigan Method of Apportionment
By Predominant Industry, Measured by Payroll, of Group

| Industry | Winners |  | Losers |  | $\begin{gathered} \text { No Change } \\ \# \\ \hline \end{gathered}$ | Total |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \$ | \# | \$ |  | \# | \$ |
| Agriculture | 0.2\% | 0.0\% | 0.3\% | 0.0\% | 0.4\% | 0.3\% | 0.0\% |
| Mining | 0.4\% | 0.2\% | 0.5\% | 0.1\% | 0.5\% | 0.5\% | -0.1\% |
| Utilities | 1.3\% | 15.6\% | 1.3\% | 0.4\% | 1.5\% | 1.4\% | -18.1\% |
| Construction | 4.4\% | 1.0\% | 4.0\% | 1.1\% | 4.5\% | 4.3\% | 1.1\% |
| Manufacturing | 23.0\% | 20.8\% | 26.9\% | 25.7\% | 20.2\% | 23.4\% | 31.6\% |
| Wholesale Trade | 6.9\% | 4.8\% | 9.6\% | 4.5\% | 4.4\% | 7.0\% | 4.3\% |
| Retail Trade | 5.1\% | 2.2\% | 8.1\% | 18.5\% | 5.7\% | 6.4\% | 38.3\% |
| Transportation and Warehousing | 4.1\% | 2.8\% | 3.8\% | 1.1\% | 3.5\% | 3.8\% | -1.1\% |
| Information | 6.0\% | 6.0\% | 4.6\% | 9.8\% | 6.1\% | 5.5\% | 14.3\% |
| Finance and Insurance | 10.6\% | 17.6\% | 8.4\% | 19.5\% | 11.4\% | 10.1\% | 21.8\% |
| Real Estate and Rental and Leasing | 6.6\% | 1.8\% | 4.9\% | 1.6\% | 9.3\% | 6.9\% | 1.3\% |
| Professional, Scientific and Technical Services | 14.5\% | 12.0\% | 12.4\% | 7.6\% | 16.2\% | 14.3\% | 2.4\% |
| Management of Companies | 4.8\% | 3.1\% | 4.6\% | 4.7\% | 4.1\% | 4.5\% | 6.6\% |
| Admin. Support, Waste Mgmt., and Remediation Svcs. | 4.2\% | 6.7\% | 3.4\% | 1.5\% | 2.7\% | 3.4\% | -4.9\% |
| Educational Services | 0.8\% | 0.8\% | 0.4\% | 0.1\% | 0.7\% | 0.6\% | -0.8\% |
| Health Care and Social Assistance | 2.7\% | 2.7\% | 1.9\% | 1.0\% | 3.5\% | 2.7\% | -1.1\% |
| Arts, Entertainment, and Recreation | 0.7\% | 0.5\% | 0.4\% | 0.0\% | 0.8\% | 0.6\% | -0.6\% |
| Accommodation and Food Services | 1.9\% | 0.8\% | 2.5\% | 2.6\% | 2.0\% | 2.2\% | 4.7\% |
| Other Services | 1.6\% | 0.2\% | 1.5\% | 0.3\% | 1.8\% | 1.7\% | 0.4\% |
| Misreported | 0.3\% | 0.3\% | 0.4\% | 0.1\% | 0.5\% | 0.4\% | -0.2\% |
| Total | 100\% | 100.0\% | 100.0\% | 100.0\% | 100.0\% | 100.0\% | 100.0\% |

Bureau of Revenue Estimates
Comptroller of Maryland
March 2, 2010

Tax Year 2006 Estimated Impact of Combined Reporting

## Joyce Method of Apportionment

By Group Maryland Modified Income

| Group Maryland Modified Income | Winners |  |  | Losers |  |  | No Change \# | Total |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \$ | Average | \# | \$ | Average |  | \# | \$ |
| Non-Taxable | 636 | $(58,258,315)$ | $(91,601)$ | 0 | 0 | 0 | 1,614 | 2,250 | $(58,258,315)$ |
| Under \$500,000 | 263 | $(1,366,434)$ | $(5,196)$ | 345 | 389,297 | 1,128 | 197 | 805 | $(977,137)$ |
| \$500,000 to \$999,999 | 79 | $(620,592)$ | $(7,856)$ | 86 | 278,789 | 3,242 | 36 | 201 | $(341,803)$ |
| \$1,000,000 to \$4,999,999 | 277 | $(5,508,770)$ | $(19,887)$ | 310 | 2,696,701 | 8,699 | 92 | 679 | $(2,812,069)$ |
| \$5,000,000 to \$9,999,999 | 133 | $(2,937,652)$ | $(22,088)$ | 173 | 2,093,261 | 12,100 | 35 | 341 | $(844,391)$ |
| \$10,000,000 to \$24,999,999 | 181 | $(6,787,811)$ | $(37,502)$ | 287 | 5,054,093 | 17,610 | 44 | 512 | $(1,733,718)$ |
| \$25,000,000 to \$99,999,999 | 259 | $(20,418,593)$ | $(78,836)$ | 390 | 23,171,834 | 59,415 | 45 | 694 | 2,753,241 |
| \$100,000,000 to \$249,999,999 | 105 | $(7,338,184)$ | $(69,887)$ | 228 | 28,446,270 | 124,764 | 20 | 353 | 21,108,086 |
| \$250,000,000 to \$499,999,999 | 46 | $(14,058,817)$ | $(305,626)$ | 120 | 28,872,165 | 240,601 | 4 | 170 | 14,813,348 |
| \$500,000,000 to \$999,999,999 | 35 | $(10,157,516)$ | $(290,215)$ | 83 | 49,179,754 | 592,527 | 5 | 123 | 39,022,238 |
| \$1,000,000,000 and Over | 44 | $(31,788,402)$ | $(722,464)$ | 112 | 163,188,217 | 1,457,038 | 0 | 156 | 131,399,815 |
| Total | 2,058 | $(159,241,086)$ | $(77,377)$ | 2,134 | 303,370,381 | 142,160 | 2,092 | 6,284 | 144,129,295 |

Bureau of Revenue Estimates
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Tax Year 2006 Estimated Impact of Combined Reporting

## Finnigan Method of Apportionment

By Group Maryland Modified Income

| Group Maryland Modified Income | Winners |  |  | Losers |  |  | No Change \# | Total |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \$ | Average | \# | \$ | Average |  | \# | \$ |
| Non-Taxable | 636 | $(58,258,315)$ | $(91,601)$ | 0 | 0 | 0 | 1,614 | 2,250 | $(58,258,315)$ |
| Under \$500,000 | 252 | $(1,356,466)$ | $(5,383)$ | 364 | 397,721 | 1,093 | 189 | 805 | $(958,745)$ |
| \$500,000 to \$999,999 | 76 | $(619,569)$ | $(8,152)$ | 95 | 264,613 | 2,785 | 30 | 201 | $(354,956)$ |
| \$1,000,000 to \$4,999,999 | 265 | $(5,364,683)$ | $(20,244)$ | 336 | 2,831,115 | 8,426 | 78 | 679 | $(2,533,568)$ |
| \$5,000,000 to \$9,999,999 | 125 | $(2,882,552)$ | $(23,060)$ | 186 | 2,441,733 | 13,128 | 30 | 341 | $(440,819)$ |
| \$10,000,000 to \$24,999,999 | 162 | $(6,663,059)$ | $(41,130)$ | 318 | 5,688,111 | 17,887 | 32 | 512 | $(974,948)$ |
| \$25,000,000 to \$99,999,999 | 225 | $(19,920,447)$ | $(88,535)$ | 443 | 26,824,858 | 60,553 | 26 | 694 | 6,904,411 |
| \$100,000,000 to \$249,999,999 | 79 | $(6,689,802)$ | $(84,681)$ | 258 | 34,676,554 | 134,405 | 16 | 353 | 27,986,752 |
| \$250,000,000 to \$499,999,999 | 37 | $(12,735,847)$ | $(344,212)$ | 131 | 34,112,425 | 260,400 | $\} 7$ | \} 293 | 21,376,578 |
| \$500,000,000 to \$999,999,999 | 27 | $(9,556,637)$ | $(353,950)$ | 91 | 55,011,397 | 604,521 |  | 293 | 45,454,760 |
| \$1,000,000,000 and Over | 40 | $(28,596,030)$ | $(714,901)$ | 116 | 187,236,927 | 1,614,111 | 0 | 156 | 158,640,897 |
| Total | 1,924 | $(152,643,407)$ | $(79,336)$ | 2,338 | 349,485,454 | 149,481 | 2,022 | 6,284 | 196,842,047 |

*Brackets indicate consolidation for dislosure purposes.
Bureau of Revenue Estimates
Comptroller of Maryland
March 2, 2010

## Tax Year 2006 Estimated Impact of Combined Reporting

Joyce Method of Apportionment
By Predominant Industry, Measured by Payroll, of Group

| Industry | Winners |  |  | Losers |  |  | No Change$\qquad$ \# | Total |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \$ | Average | \# | \$ | Average |  | \# | \$ |
| Agriculture | 7 | $(46,853)$ | $(6,693)$ | 11 | 127,718 | 11,611 | 11 | 29 | 80,865 |
| Mining | 8 | $(152,192)$ | $(19,024)$ | 13 | 385,444 | 29,650 | 10 | 31 | 233,252 |
| Utilities | 32 | $(17,198,450)$ | $(537,452)$ | 30 | 1,247,467 | 41,582 | 33 | 95 | $(15,950,983)$ |
| Construction | 109 | $(2,016,142)$ | $(18,497)$ | 94 | 6,992,452 | 74,388 | 94 | 297 | 4,976,310 |
| Manufacturing | 535 | $(32,350,605)$ | $(60,468)$ | 529 | 75,044,135 | 141,860 | 413 | 1,477 | 42,693,530 |
| Wholesale Trade | 145 | $(4,035,300)$ | $(27,830)$ | 188 | 17,595,177 | 93,591 | 95 | 428 | 13,559,877 |
| Retail Trade | 104 | $(5,281,976)$ | $(50,788)$ | 203 | 64,822,749 | 319,324 | 97 | 404 | 59,540,773 |
| Transportation and Warehousing | 80 | $(2,392,494)$ | $(29,906)$ | 89 | 5,013,923 | 56,336 | 63 | 232 | 2,621,429 |
| Information | 107 | $(29,039,412)$ | $(271,396)$ | 89 | 22,907,291 | 257,385 | 140 | 336 | $(6,132,121)$ |
| Finance and Insurance | 190 | $(16,086,195)$ | $(84,664)$ | 196 | 59,371,776 | 302,917 | 226 | 612 | 43,285,581 |
| Real Estate and Rental and Leasing | 138 | $(9,200,693)$ | $(66,672)$ | 112 | 8,774,638 | 78,345 | 181 | 431 | $(426,055)$ |
| Professional, Scientific and Technical Services | 260 | $(13,899,324)$ | $(53,459)$ | 271 | 16,877,167 | 62,277 | 377 | 908 | 2,977,843 |
| Management of Companies | 102 | $(11,980,304)$ | $(117,454)$ | 76 | 6,612,028 | 87,000 | 90 | 268 | $(5,368,276)$ |
| Admin. Support, Waste Mgmt., and Remediation Svcs. | 77 | $(4,790,185)$ | $(62,210)$ | 67 | 5,385,217 | 80,376 | 71 | 215 | 595,032 |
| Educational Services | 20 | $(881,713)$ | $(44,086)$ | 16 | 241,206 | 15,075 | 11 | 47 | $(640,507)$ |
| Health Care and Social Assistance | 51 | $(5,621,531)$ | $(110,226)$ | 49 | 2,821,254 | 57,577 | 68 | 168 | $(2,800,277)$ |
| Arts, Entertainment, and Recreation | 17 | $(758,771)$ | $(44,634)$ | 9 | 109,799 | 12,200 | 17 | 43 | $(648,972)$ |
| Accommodation and Food Services | 33 | $(2,671,182)$ | $(80,945)$ | 57 | 8,181,117 | 143,528 | 41 | 131 | 5,509,935 |
| Other Services | 35 | $(414,809)$ | $(11,852)$ | 27 | 588,533 | 21,798 | 43 | 105 | 173,724 |
| Misreported | 8 | $(422,955)$ | $(52,869)$ | 8 | 271,290 | 33,911 | 11 | 27 | $(151,665)$ |
| Total | 2,058 | $(159,241,086)$ | $(77,377)$ | 2,134 | 303,370,381 | 142,160 | 2,092 | 6,284 | 144,129,295 |

Bureau of Revenue Estimates
Comptroller of Maryland
March 2, 2010

Tax Year 2006 Estimated Distributional Impact of Combined Reporting Joyce Method of Apportionment
By Predominant Industry, Measured by Payroll, of Group

| Industry | Winners |  | Losers |  | No Change \# $\qquad$ | Total |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \$ | \# | \$ |  | \# | \$ |
| Agriculture | 0.3\% | 0.0\% | 0.5\% | 0.0\% | 0.5\% | 0.5\% | 0.1\% |
| Mining | 0.4\% | 0.1\% | 0.6\% | 0.1\% | 0.5\% | 0.5\% | 0.2\% |
| Utilities | 1.6\% | 10.8\% | 1.4\% | 0.4\% | 1.6\% | 1.5\% | -11.1\% |
| Construction | 5.3\% | 1.3\% | 4.4\% | 2.3\% | 4.5\% | 4.7\% | 3.5\% |
| Manufacturing | 26.0\% | 20.3\% | 24.8\% | 24.7\% | 19.7\% | 23.5\% | 29.6\% |
| Wholesale Trade | 7.0\% | 2.5\% | 8.8\% | 5.8\% | 4.5\% | 6.8\% | 9.4\% |
| Retail Trade | 5.1\% | 3.3\% | 9.5\% | 21.4\% | 4.6\% | 6.4\% | 41.3\% |
| Transportation and Warehousing | 3.9\% | 1.5\% | 4.2\% | 1.7\% | 3.0\% | 3.7\% | 1.8\% |
| Information | 5.2\% | 18.2\% | 4.2\% | 7.6\% | 6.7\% | 5.3\% | -4.3\% |
| Finance and Insurance | 9.2\% | 10.1\% | 9.2\% | 19.6\% | 10.8\% | 9.7\% | 30.0\% |
| Real Estate and Rental and Leasing | 6.7\% | 5.8\% | 5.2\% | 2.9\% | 8.7\% | 6.9\% | -0.3\% |
| Professional, Scientific and Technical Services | 12.6\% | 8.7\% | 12.7\% | 5.6\% | 18.0\% | 14.4\% | 2.1\% |
| Management of Companies | 5.0\% | 7.5\% | 3.6\% | 2.2\% | 4.3\% | 4.3\% | -3.7\% |
| Admin. Support, Waste Mgmt., and Remediation Svcs. | 3.7\% | 3.0\% | 3.1\% | 1.8\% | 3.4\% | 3.4\% | 0.4\% |
| Educational Services | 1.0\% | 0.6\% | 0.7\% | 0.1\% | 0.5\% | 0.7\% | -0.4\% |
| Health Care and Social Assistance | 2.5\% | 3.5\% | 2.3\% | 0.9\% | 3.3\% | 2.7\% | -1.9\% |
| Arts, Entertainment, and Recreation | 0.8\% | 0.5\% | 0.4\% | 0.0\% | 0.8\% | 0.7\% | -0.5\% |
| Accommodation and Food Services | 1.6\% | 1.7\% | 2.7\% | 2.7\% | 2.0\% | 2.1\% | 3.8\% |
| Other Services | 1.7\% | 0.3\% | 1.3\% | 0.2\% | 2.1\% | 1.7\% | 0.1\% |
| Misreported | 0.4\% | 0.3\% | 0.4\% | 0.1\% | 0.5\% | 0.4\% | -0.1\% |
| Total | 100\% | 100.0\% | 100.0\% | 100.0\% | 100.0\% | 100.0\% | 100.0\% |

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## Tax Year 2006 Estimated Impact of Combined Reporting

## Finnigan Method of Apportionment

By Predominant Industry, Measured by Payroll, of Group
Industry
Agriculture
Mining
Utilities
Construction
Manufacturing
Wholesale Trade
Retail Trade
Transportation and Warehousing
Information
Finance and Insurance
Real Estate and Rental and Leasing
Professional, Scientific and Technical Services
Management of Companies
Admin. Support, Waste Mgmt., and Remediation Svcs.
Educational Services
Health Care and Social Assistance
Arts, Entertainment, and Recreation
Accommodation and Food Services
Other Services
Misreported
Total

| Winners |  |  |
| ---: | ---: | ---: |
| $\#$ | $\$$ | Average |
| 7 | $(46,853)$ | $(6,693)$ |
| 8 | $(149,026)$ | $(18,628)$ |
| 32 | $(17,198,450)$ | $(537,452)$ |
| 103 | $(1,906,786)$ | $(18,512)$ |
|  |  |  |
| 456 | $(30,164,528)$ | $(66,150)$ |
| 81 | $(11,946,734)$ | $(147,491)$ |
| 15 | $(1,381,717)$ | $(92,114)$ |
| 78 | $(2,348,443)$ | $(30,108)$ |
|  |  |  |
| 104 | $(27,436,584)$ | $(263,813)$ |
| 183 | $(15,356,989)$ | $(83,918)$ |
| 134 | $(8,443,689)$ | $(63,013)$ |
| 253 | $(13,754,869)$ | $(54,367)$ |
|  |  |  |
| 95 | $(11,530,679)$ | $(121,376)$ |
| 77 | $(4,763,722)$ | $(61,867)$ |
| 20 | $(881,634)$ | $(44,082)$ |
| 51 | $(5,610,743)$ | $(110,015)$ |
|  |  |  |
| 17 | $(758,771)$ | $(44,634)$ |
| 32 | $(2,659,851)$ | $(83,120)$ |
| 33 | $(217,975)$ | $(6,605)$ |
| 8 | $(422,955)$ | $(52,869)$ |
|  |  |  |
| 1,924 | $(152,643,407)$ | $(79,336)$ |


| Losers |  |  |
| :---: | :---: | :---: |
| \# | \$ | Average |
| 11 | 127,134 | 11,558 |
| 13 | 688,250 | 52,942 |
| 30 | 1,260,228 | 42,008 |
| 102 | 7,665,764 | 75,155 |
| 634 | 101,224,323 | 159,660 |
| 70 | 4,186,355 | 92,205 |
| 9 | 131,598 | 327,008 |
| 96 | 4,698,028 | 48,938 |
| 93 | 26,686,951 | 286,956 |
| 212 | 66,463,196 | 313,506 |
| 119 | 8,956,824 | 75,267 |
| 286 | 18,291,002 | 63,955 |
| 87 | 8,018,954 | 92,172 |
| 69 | 5,704,186 | 82,669 |
| 16 | 307,159 | 19,197 |
| 49 | 2,848,264 | 58,128 |
| 10 | 127,028 | 12,703 |
| 58 | 8,208,473 | 141,525 |
| 32 | 783,742 | 24,492 |
| 8 | 271,401 | 33,925 |
| 2,338 | 349,485,454 | 149,481 |


| No Change <br> \# | Total |  |
| :---: | :---: | :---: |
|  | \# | \$ |
| 11 | 29 | 80,281 |
| 10 | 31 | 539,224 |
| 33 | 95 | $(15,938,222)$ |
| 92 | 297 | 5,758,978 |
| 387 | 1,477 | 71,059,795 |
| 90 | 428 | 14,967,410 |
| 96 | 404 | 63,196,277 |
| 58 | 232 | 2,349,585 |
| 139 | 336 | $(749,633)$ |
| 217 | 612 | 51,106,207 |
| 178 | 431 | 513,135 |
| 369 | 908 | 4,536,133 |
| 86 | 268 | $(3,511,725)$ |
| 69 | 215 | 940,464 |
| 11 | 47 | $(574,475)$ |
| 68 | 168 | $(2,762,479)$ |
| 16 | 43 | $(631,743)$ |
| 41 | 131 | 5,548,622 |
| 40 | 105 | 565,767 |
| 11 | 27 | $(151,554)$ |
| 2,022 | 6,284 | 196,842,047 |

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Tax Year 2007 Estimated Distributional Impact of Combined Reporting

## Finnigan Method of Apportionment

By Predominant Industry, Measured by Payroll, of Group

| Industry | Winners |  | Losers |  | No Change$\qquad$ | Total |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \$ | \# | \$ |  | \# | \$ |
| Agriculture | 0.4\% | 0.0\% | 0.5\% | 0.0\% | 0.5\% | 0.5\% | 0.0\% |
| Mining | 0.4\% | 0.1\% | 0.6\% | 0.2\% | 0.5\% | 0.5\% | 0.3\% |
| Utilities | 1.7\% | 11.3\% | 1.3\% | 0.4\% | 1.6\% | 1.5\% | -8.1\% |
| Construction | 5.4\% | 1.2\% | 4.4\% | 2.2\% | 4.5\% | 4.7\% | 2.9\% |
| Manufacturing | 23.7\% | 19.8\% | 27.1\% | 29.0\% | 19.1\% | 23.5\% | 36.1\% |
| Wholesale Trade | 7.0\% | 2.5\% | 8.7\% | 5.4\% | 4.5\% | 6.8\% | 7.6\% |
| Retail Trade | 5.1\% | 3.4\% | 8.9\% | 19.6\% | 4.7\% | 6.4\% | 32.1\% |
| Transportation and Warehousing | 4.1\% | 1.5\% | 4.1\% | 1.3\% | 2.9\% | 3.7\% | 1.2\% |
| Information | 5.4\% | 18.0\% | 4.0\% | 7.6\% | 6.9\% | 5.3\% | -0.4\% |
| Finance and Insurance | 9.5\% | 10.1\% | 9.1\% | 19.0\% | 10.7\% | 9.7\% | 26.0\% |
| Real Estate and Rental and Leasing | 7.0\% | 5.5\% | 5.1\% | 2.6\% | 8.8\% | 6.9\% | 0.3\% |
| Professional, Scientific and Technical Services | 13.1\% | 9.0\% | 12.2\% | 5.2\% | 18.2\% | 14.4\% | 2.3\% |
| Management of Companies | 4.9\% | 7.6\% | 3.7\% | 2.3\% | 4.3\% | 4.3\% | -1.8\% |
| Admin. Support, Waste Mgmt., and Remediation Svcs. | 4.0\% | 3.1\% | 3.0\% | 1.6\% | 3.4\% | 3.4\% | 0.5\% |
| Educational Services | 1.0\% | 0.6\% | 0.7\% | 0.1\% | 0.5\% | 0.7\% | -0.3\% |
| Health Care and Social Assistance | 2.7\% | 3.7\% | 2.1\% | 0.8\% | 3.4\% | 2.7\% | -1.4\% |
| Arts, Entertainment, and Recreation | 0.9\% | 0.5\% | 0.4\% | 0.0\% | 0.8\% | 0.7\% | -0.3\% |
| Accommodation and Food Services | 1.7\% | 1.7\% | 2.5\% | 2.3\% | 2.0\% | 2.1\% | 2.8\% |
| Other Services | 1.7\% | 0.1\% | 1.4\% | 0.2\% | 2.0\% | 1.7\% | 0.3\% |
| Misreported | 0.4\% | 0.3\% | 0.3\% | 0.1\% | 0.5\% | 0.4\% | -0.1\% |
| Total | 100\% | 100.0\% | 100.0\% | 100.0\% | 100.0\% | 100.0\% | 100.0\% |

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