

LOBBYING REPORT

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SECRETARY OF THE SENATE
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HAND DELIVERED

Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required To Complete This Page.

1. Registrant Name
Covington & Burling

2. Address Check if different than previously reported.
1201 Pennsylvania Avenue, N.W., P.O. Box 7566

3. Principal Place of Business (if different from line 2)
City: **Washington** State/Zip (or Country) **D.C. 20044**

4. Contact Name Roderick A. DeArment	Telephone 202-662-5900	Email (optional) kmathews@cov.com	5. Senate ID # 11195-710
7. Client Name <input type="checkbox"/> Self Retirement Income Coalition	6. House ID # 31827058		

TYPE OF REPORT 8. Year 1999 Midyear (January 1-June 30) OR Year End (July 1-December 31)

9. Check if this filing amends a previously filed version of this report

10. Check if this is a Termination Report ⇌ Termination Date _____ 11. No Lobbying Activity

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

12. Lobbying Firms	13. Organizations
<p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input checked="" type="checkbox"/> ⇌ \$ <u>40,000</u> Income (nearest \$20,000)</p> <p>Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income for the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client.)</p>	<p>EXPENSES relating to lobbying activities for this reporting period were:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> ⇌ \$ _____ Expenses (nearest \$20,000)</p> <p>14. REPORTING METHOD. Check box to indicate expense accounting method. See instructions for description of options.</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA definitions only</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under 162(e) of the Internal Revenue Code</p>

Signature  Date August 12, 1999
Printed Name and Title Roderick A. DeArment

Registrant Name Covington & Burling

Client Name Retirement Income Coalition

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Attach additional page(s) as needed.

15. General issue area code TAX (one per page)

16. Specific lobbying issues

Legislation to permit a well-funded pension plan to use a portion of its surplus assets to fund other retirement benefits for pension plan participants

17. House(s) of Congress and Federal agencies contacted Check if None

House of Representatives
Senate

18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)	New
John M. Vine	Partner	<input type="checkbox"/>
Roderick A. DeArment	Partner	<input type="checkbox"/>
		<input type="checkbox"/>

19. Interest of each foreign entity in the specific issues listed on line 16 above Check if None

Signature _____ Date August 12, 1999
Printed Name and Title Roderick A. DeArment

Registrant Name Covington & Burling

Client Name Retirement Income Coalition

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15. General issue area code RET (one per page)

16. Specific lobbying issues

Legislation to permit a well-funded pension plan to use a portion of its surplus assets to fund other retirement benefits for pension plan participants

17. House(s) of Congress and Federal agencies contacted Check if None

House of Representatives
Senate

18. Name of each individual who acted as a lobbyist in this issue area

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Roderick A. DeArment	Partner	<input type="checkbox"/>
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