

Clerk of the House of Representatives
Legislative Resource Center
B-1 06 Cannon Building
Washington, DC 20515

Secretary of the Senate
Office of Public Records
232 Hart Building
Washington, DC 20510

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LOBBYING REPORT

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

1. Registrant Name Davis & Harman LLP			
2. Address <input type="checkbox"/> Check if different than previously reported 1455 Pennsylvania Avenue NW, Suite 1200, Washington, DC 20004			
3. Principal Place of Business (if different from line 2) City: _____ State/Zip (or Country) _____			
4. Contact Name Janis McClintock	Telephone 202/347-2230	E-mail (optional)	5. Senate ID
5. Client Name <input type="checkbox"/> Self Delta Airlines, Inc.			6. House ID 31318085

TYPE OF REPORT 8. Year 2004 Midyear (January 1-June 30) OR Year End (July 1-December 31)

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

10. Check if this is a Termination Report Termination Date _____

11. No Lobbying Activities

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

12. Lobbying Firms	13. Organizations
INCOME relating to lobbying activities for this reporting period was:	EXPENSES relating to lobbying activities for this period were:
Less than \$10,000 <input type="checkbox"/>	Less than \$10,000 <input type="checkbox"/>
\$10,000 or more <input checked="" type="checkbox"/> \$ 20,000.00 Income (nearest \$20,000)	\$10,000 or more <input type="checkbox"/> \$ _____ Income (nearest \$20,000)
Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).	14. REPORTING METHOD. Check box to indicate accounting method. See instructions for description
	<input type="checkbox"/> Method A. Reporting amounts using LDA definition
	<input type="checkbox"/> Method B. Reporting amounts under section 6033 Internal Revenue Code
	<input type="checkbox"/> Method C. Reporting amounts under section 162(e) Internal Revenue Code

Signature _____

Printed Name and Title _____

Registrant Name **Davis & Harman LLP**

Client Name **Delta Airlines, Inc.**

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

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

16. Specific lobbying issues

Application of funding rules to Delta defined benefit plans.

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)
Randolf Hurst Hardock	
James M. Delaplane, Jr	

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

Signature *Randolf Hurst Hardock* Date 2/20/05

Printed Name and Title **Randolf Hurst Hardock, Partner**

