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LOBBYING REPORT

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

1. Registrant Name International Business Machines Corporation (IBM)			
2. Address <input type="checkbox"/> Check if different than previously reported 1301 K Street, N.W., Washington, D.C. 20005-3307			
3. Principal Place of Business (if different from line 2) City: Armonk State/Zip (or Country) New York 10504			
4. Contact Name Marcus P. Williams	Telephone (202) 515-5522	E-mail (optional) marcwill@us.ibm.com	5. Senate ID # 19877-1
7. Client Name <input checked="" type="checkbox"/> Self			6. House ID # 3112300

TYPE OF REPORT 8. Year 2002 Midyear (January 1-June 30) OR Year End (July 1-De
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 Lobbyi

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

<p align="center">12. Lobbying Firms</p> <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 type="checkbox"/> ⇒ \$ _____ Income (nearest \$20,000)</p> <p>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).</p>	<p align="center">13. Organizations</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 checked="" type="checkbox"/> ⇒ \$ <u>2,600,000.00</u> Expenses (nearest \$20,000)</p> <p>14. REPORTING METHOD. Check box to indicate accounting method. See instructions for description.</p> <p><input checked="" type="checkbox"/> Method A. Reporting amounts using LDA defir</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 60 Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 14 Internal Revenue Code</p>
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Signature _____

Printed Name and Title

See Page 50

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

IBM has lobbied for various Government Programs, including Amtrak, Customs Modernization Program, IT Projects, Patent and Trademark Office, and Government/Private Sector Research and Development Programs.

Please see General Lobbying Area Codes CPT, DEF, HCR, RRR, SCI, and TRD for the report o these issues.

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

See General Lobbying Issue Area Codes CPT, DEF, HCR, RRR, SCI, and TRD

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

Name	Covered Official Position (if applicable)
See General Lobbying Issue	
Area Codes CPT, DEF, HCR, RRR, SCI, and TRD	

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

See General Lobbying Issue Area Codes CPT, DEF, HCR, RRR, SCI, and TRD

Signature _____ Date _____

Printed Name and Title _____ See Page 50

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

- Freedom of Information Act (FOIA)
- Critical Infrastructure Information Sharing Exemptions
- H.R. 5005 To Establish a Department of Homeland Security
- S. 2452 To Establish a Department of National Homeland Security and National Office for Combating Terrorism
- Structure of Proposed Department of Homeland Security

(See Attached Continuation Sheet)

17. House(s) of Congress and Federal agencies contacted

- House of Representatives
- Senate
- Executive Office of the President
- National Security Council
- Office of Management and Budget
- Office of Homeland Security

- Check if None
- General Services Administration
- U.S. Department of Commerce
- Critical Infrastructure Assurance Office

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patrick A. Hunnicutt	
Timothy B. Hackman	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

Printed Name and Title _____ See Page 50

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area CPI**

16. Specific lobbying issues

H.R. 5005/S.2452 (Cont'd)

Cybersecurity Research and Development

Security Technology Mandates

Government Evaluation/Certification of Security Products

Freedom of Information Act

Risk Sharing for Homeland Security Technology and Services

H.R. 3844 Federal Information Security Management Act (FISMA)

Government Information Security Reform Act (GISRA) Renewal

H.R. 2435 Cyber Security Information Act

H.R. 3394 Cyber Security Research and Development Act of 2002

H.R. 3482 Cyber Security Enhancement Act of 2001

S. 1456 Critical Infrastructure Information Security Act of 2001

S. 1900 Cyberterrorism Preparedness Act of 2002

S. 1901 Cybersecurity Research and Education Act of 2002

S. 2182 Cyber Security Research and Development Act

Security-Related Standards

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area CPI**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
..... Adrienne G. Rhone
..... Timothy J. Sheehy
..... Susan M. Siemietkowski
..... Gregory W. Waddell

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

Privacy

S. 2201 Online Personal Privacy Act

H.R. 4678 Consumer Privacy Protection Act

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

House of Representatives

Senate

Department of Commerce

International Trade Administration

Federal Trade Commission

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Christopher J. Mustain	
Edmund F. Perry	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

Printed Name and Title _____ See Page 50

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area CSP**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
..... Paul R. Redifer
..... Adrienne G. Rhone
..... Timothy J. Sheehy
..... Susan S. Siemietkowski
..... Gregory W. Waddell

Registrant Name IBM Client Name Self

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

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

- 16. Specific lobbying issues
 - Software Patents
 - Business Methods Patents
 - Patent Reexamination
 - Digital Rights Management
 - Database Protection

(See Attached Continuation Sheet)

17. House(s) of Congress and Federal agencies contacted Check if None
- House of Representatives
 - Senate
 - Executive Office of the President
 - Office of the United States Trade Representative
 - Department of Commerce
 - Patent and Trademark Office

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Cheryl L. Bruner	
Timothy B. Hackman	
Patrick A. Hunnicutt	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

Printed Name and Title _____ See Page 50

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area CPT**

16. Specific lobbying issues

Patent and Trademark Issues

Patent and Trademark Office Funding

Patent and Trademark Office Strategic Plan

Proposed Patent Fee Restructuring

S. 2778 Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriations Act, 2003

Patent and Trademark Office Funding

Open Source Software Use in Public Sector

H.Res. 110 Providing that it shall not be in Order in the House of Representatives to Consider Certain Funding Measures for the U.S. Patent and Trademark Office

H.R. 614 Copyright Technical Corrections Act of 2001

H.R. 615 Intellectual Property Technical Amendments Act of 2001

H.R. 741/S. 407 Madrid Protocol Implementation Act

H.R. 1332 Business Methods Patent Improvement Act of 2001

H.R. 1333 Patent Improvement Act of 2001

H.R. 1866 To Amend Title 35, United States Code, to Clarify the Basis for Granting Requests for Reexamination of Patents

H.R. 1886 To Amend Title 35, United States Code, to Provide for Appeals by Third Parties in Certain Patent Reexamination Proceedings

H.R. 2100 Twenty-First Century Distance Learning Enhancement Act

H.R. 2231 Patent Reexamination Enhancement Act of 2001

H.R. 740 Patent and Trademark Office Reauthorization Act

H.R. 2047/S. 1754 Patent and Trademark Office Authorization Act of 2002

S. 320 Intellectual Property and High Technology Technical Amendments Act of 2001

S. 487 Technology, Education, and Copyright Harmonization Act of 2001

S. 2048 Consumer Broadband and Digital Television Promotion Act

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area CPT**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
..... Adrienne G. Rhone
..... Susan M. Siemietkowski
..... Timothy J. Sheehy
..... Gregory W. Waddell

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

- H.R. 5010 Department of Defense Appropriations Act, 2003
- Defense Integrated Military Human Resources System
- H.R. 4546/S. 2514 National Defense Authorization Act for Fiscal Year 2003
- Department of Defense Contracting Reform Amendment
- Trade Agreements Act Amendment
- Science and Technology Research and Development

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)
Christopher G. Caine	
Patrick A. Hunnicutt	
Edgar H. McCulloch III	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

Printed Name and Title See Page 50

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues
Educational Standards
Workforce Development

17. House(s) of Congress and Federal agencies contacted Check if None
House of Representatives
Senate
Executive Office of the President
Domestic Policy Council
National Economic Council
Office of Science and Technology Policy
Department of Education

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Edgar H. McCulloch III	
Edmund F. Perry	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

Printed Name and Title _____ See Page 50

Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area EDU

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
..... Paul R. Redifer
..... Adrienne G. Rhone
..... Susan M. Siemietkowski

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

- Energy Efficiency Programs for Office Equipment (Energy Star)
- Energy Efficient Standby Power Devices - Executive Order 13221
- Low Frequency Emission Standards - European Union
- H.R. 4 SAFE Act of 2001
- H.R. 2587 Energy Advancement and Conservation Act of 2001

(See Attached Continuation Sheet)

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

- House of Representatives
- Senate
- Executive Office of the President
- Office of the United States Trade Representative
- Department of Energy
- Office of International Energy Policy
- Federal Energy Regulatory Commission

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Edward A. Gillespie	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Edmund F. Perry	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

Printed Name and Title _____ See Page 50

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area ENG**

16. Specific lobbying issues

S. 388 National Energy Security Act of 2001

S. 1766 Energy Policy Act of 2002

S. 517 Energy Security Policy Act of 2001

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area ENG**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
..... Paul R. Redifer
..... Adrienne G. Rhone
..... Susan M. Siemietkowski
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Registrant Name IBM Client Name Self

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

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

- 16. Specific lobbying issues
 - Environmental Protection Agency Programs
 - Energy Star Program
 - Electronic Product Regulation
 - Recycling

- 17. House(s) of Congress and Federal agencies contacted Check if None
 - House of Representatives
 - Senate
 - Environmental Protection Agency
 - Department of Energy

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Edward A. Gillespie	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Edmund F. Perry	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

Printed Name and Title _____ See Page 50

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

- H.R. 2458/S. 803 E-Government Act of 2001
- European Standards for Electronics
- H.R. 721/S. 1152 Truthfulness, Responsibility and Accountability in Contracting Act
- H.R. 2227 To Amend Title 10, United States Code, to Give Certain Rights to Department of Defense Employees with Respect to Actions or Determination Under Office of Management and Budget Accessibility - Section 508 Requirements

(See Attached Continuation Sheet)

- 17. House(s) of Congress and Federal agencies contacted
 - House of Representatives
 - Senate
 - Executive Office of the President
 - Office of the United States Trade Representative
 - Office of Management and Budget
 - Office of Federal Procurement Policy
 - General Services Administration
 - The Access Board

- Check if None
 - Department of Defense
 - Office of Procurement Policy

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Edward A. Gillespie	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Bruce E. Leinster	
Edgar H. McCulloch III	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

Printed Name and Title _____ See Page 50

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area GOV**

16. Specific lobbying issues

H.R. 3832 Services Acquisition Reform Act of 2002
Trade Agreements Act Information Technology Exemption
Implementation of Section 803, National Defense Authorization Act for Fiscal Year 2002,
Concerning GSA Ordering Rules

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area GOV**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
.....
Edmund F. Perry		
.....
Brian J. Raymond		
.....
Paul R. Redifer		
.....
Adrienne G. Rhone		
....
Susan M. Siemietkowski		
.....
William H. Warner		

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

H.R. 2563/S. 1052 Bipartisan Patient Protection Act

Life Sciences Policy

H.R. 602/S. 318 Genetic NonDiscrimination in Health Insurance and Employment Act

H.R. 3448/S. 1765 Bioterrorism Preparedness Act of 2001

S. 2766 Department of Health and Human Services Appropriations Act, 2003

Funding to Augment Centers for Disease Control Biosurveillance Programs

17. House(s) of Congress and Federal agencies contacted

Check if None

House of Representatives

Senate

Executive Office of the President

Office of Homeland Security

Council of Economic Advisors

Domestic Policy Council

Office of Management and Budget

(See Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Geri J. Colombaro	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Edgar H. McCulloch III	
Edmund F. Perry	
(See Attached Continuation Sheet)	

19. Interest of each foreign entity in the specific issues listed on line 16 above

Check if None

Signature _____ Date _____

Printed Name and Title _____ See Page 50

**Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area HCR**

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

Department of Defense

Tricare Management Activity

Department of Veterans Affairs

Department of Health and Human Services

Agency for Healthcare Research and Quality

Centers for Disease Control and Prevention

Centers for Medicare and Medicaid Services

National Institutes of Health

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area HCR**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
..... Brian J. Raymond
..... Paul R. Redifer
..... Adrienne G. Rhone
.... Susan M. Siemietkowski

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

- S. 684/H.R. 1362 Fair Pay Act of 2001
- H.R. 781/S. 77 Paycheck Fairness Act
- H.R. 2070 The Sales Incentive Compensation Act

17. House(s) of Congress and Federal agencies contacted

- House of Representatives
- Senate
- Department of Labor

Check if None

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Geri J. Colombaro	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Edgar H. McCulloch III	
Edmund F. Perry	
Brian J. Raymond	
(See Attached Continuation Sheet)	

19. Interest of each foreign entity in the specific issues listed on line 16 above

Check if None

Signature _____ Date _____

Printed Name and Title _____ See Page 50

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area LBR**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
..... Paul R. Redifer
..... Adrienne G. Rhone
..... Susan M. Siemietkowski

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

H.R. 3292/S.824 Medication Errors Reduction Act of 2001

S. 2766 Department of Health and Human Services Appropriations Act, 2003

Funding for Medication Errors Reduction

17. House(s) of Congress and Federal agencies contacted

House of Representatives

Senate

Executive Office of the President

Office of Management and Budget

Council of Economic Advisors

Domestic Policy Council

Check if None

Department of Health and Human Services

Agency for Healthcare Research and Quality

Centers for Medicare and Medicaid Services

Health Resources and Services Administration

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Edgar H. McCulloch III	
Edmund F. Perry	
Brian J. Raymond	
(See Attached Continuation Sheet)	

19. Interest of each foreign entity in the specific issues listed on line 16 above

Check if None

Signature _____ Date _____

Printed Name and Title _____ See Page 50

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area MMM**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
..... Paul R. Redifer
..... Adrienne G. Rhone
..... Susan M. Siemietkowski

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

Amtrak

S. 2808 Department of Transportation and Related Agencies Appropriations, 2003

S. 250/H.R. 2329 High-Speed Rail Investment Act of 2001

17. House(s) of Congress and Federal agencies contacted

House of Representatives

Senate

Check if None

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patrick A. Hunnicutt	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Susan M. Siemietkowski	
William H. Warner	

19. Interest of each foreign entity in the specific issues listed on line 16 above

Check if None

Signature _____ Date _____

Printed Name and Title _____ See Page 50

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

- H.R. 10 Comprehensive Retirement Security and Pension Reform Act of 2001
- Raise 401(k) Limits
- H.R. 4778 Pension Protection Act of 2002
- S. 1971 National Employee Savings and Trust Act
- S. 2673 Public Company Accounting Reform Act
- S. 1992 Protecting America's Pensions Act of 2002
- H.R. 3762 Pension Security Act of 2002
- H.R. 2695 Employee Retirement Savings Bill of Rights

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)
Christopher G. Caine	
Geri J. Colombaro	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Edmund F. Perry	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

Printed Name and Title _____ See Page 50

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area RET**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
..... Paul R. Redifer
..... Adrienne G. Rhone
..... Susan M. Siemietkowski

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

- Government/Private Sector Research and Development Partnerships
- S.2784 Energy and Water Development Appropriations Act, 2003
- Accelerated Strategic Computer Initiative (ASCI)
- Civilian DOE Computer Simulation Technology
- Physical Science Research

(See Attached Continuation Sheet)

17. House(s) of Congress and Federal agencies contacted

Check if None

- House of Representatives
- Senate
- Executive Office of the President
- Office of Science and Technology Policy
- Office of the Vice President
- Office of Management and Budget
- National Economic Council

(See Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Edmund F. Perry	
Edgar H. McCulloch III	
Brian J. Raymond	
(See Attached Continuation Sheet)	

19. Interest of each foreign entity in the specific issues listed on line 16 above

Check if None

Signature _____ Date _____

Printed Name and Title _____ See Page 50

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area SCI**

16. Specific lobbying issues

S. 2778 Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies
Appropriations Act, 2003

Advanced Technology Program

S.2797 Veterans Affairs and Housing and Urban Development Appropriations Act, 2003

National Science Foundation Funding

Life Sciences Research Funding

**Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area SCI**

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

Department of Commerce

Department of Energy

Defense Programs

Department of Defense

Department of the Navy

Defense Advanced Research Projects Agency

National Science Foundation

Directorate for Computers and Information Sciences and Engineering

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area SCI**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
..... Paul R. Redifer
..... Adrienne G. Rhone
..... Susan M. Siemietkowski
..... William H. Warner

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

- H.R. 5095 American Competitiveness and Corporate Accountability Act of 2002
- Repeal Limitation on Use of Foreign Tax Credits Under the Corporate Alternative Minimum Tax
- Revision of Internal Revenue Code Subpart F on Deferral of Taxation
- Repeal and Replacement of Foreign Sales Corporation - Extraterritorial Income Regime
- Negotiation and Ratification of Bilateral Income Tax Treaties
- U.S. - Japan Tax Treaty
- U.S. - Australia Tax Treaty

(See Attached Continuation Sheet)

17. House(s) of Congress and Federal agencies contacted

- House of Representatives
- Senate
- Executive Office of the President
- Office of the United States Trade Representative
- Department of Treasury
- Office of Tax Policy
- Internal Revenue Service

- Check if None
- Department of Commerce
- International Trade Administration
- Department of State

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Linda C. Evans	
Patrick A. Hunnicutt	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

Printed Name and Title _____ See Page 50

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area TAX**

16. Specific lobbying issues

Negotiation and Ratification of Bilateral Income Tax Treaties (Cont'd)

U.S. - U.K. Tax Treaty

U.S. - Canada Tax Treaty

Treasury Rules on Hybrid Branches

Treasury "Check-in-the-Box" Regulations

Taxation of Software Rules (Section 18) Regulations

Taxation of Internet Transactions and Software

Fundamental Tax Reform

Internet Taxation

European Union Proposal for Taxation of Electronic Commerce

Active Financing Exception to Subpart F

Research and Development Tax Credit Regulations

Research and Development Tax Credit Refinement

H.R. 2695 To Amend the Internal Revenue Code of 1986 to Clarify the Treatment of Incent.

Stock Options and Employee Stock Purchase Plans

Stock Options and Payroll Taxes

IRS Notice 2001-72

IRS Notice 2001-73

IRS Notice 2001-14

S. 1940 Ending the Double Standard for Stock Options Act

S. 2673 Public Company Accounting Reform and Investor Protection Act of 2002

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area TAX**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
..... Adrienne G. Rhone
..... Timothy J. Sheehy
..... Susan M. Siemietkowski
..... Gregory W. Waddell

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

- International Telecommunications
- WTO Basic Telecommunications Agreement Implementation
- Asia Pacific Economic Cooperation (APEC) Telecommunications Policies
- Regulatory Treatment of Internet Service Providers
- International Charging Arrangements for Internet Services
- Electronic Commerce Trade Policy

(See Attached Continuatio

17. House(s) of Congress and Federal agencies contacted

Check if None

- House of Representatives
- Senate
- Executive Office of the President
- Office of the United States Trade Representative
- Department of Commerce
- Technology Administration
- National Telecommunications and Information Administration

(See Attached Continuati

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patrick A. Hunnicutt	
Kimberly M. Marsho	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
(See Attached Continuation Sheet)	

19. Interest of each foreign entity in the specific issues listed on line 16 above

Check if None

Signature _____ Date _____

Printed Name and Title _____ See Page 50

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area TEC**

16. Specific lobbying issues

Implementation of Telecommunications Act of 1996

FCC Proceedings

Deployment of Advanced Telecommunications Services

Access Charges

Universal Service

E-Rate

Spectrum Allocation

Ultra-Wideband

**Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area TEC**

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

Department of State

International Communications and Information Policy

Federal Communications Commission

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area TEC**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
.....
Adrienne G. Rhone
....
Susan M. Siemietkowski
....
Steven W. Stewart

Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

H.R. 5120/S. 2740 Treasury and General Government Appropriations Act, 2003

Customs Modernization

Trade Financing

Customs Classification

Information Technology Agreement Negotiations

Emerging Markets

(See Attached Continuation Sheet)

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

House of Representatives

Senate

Executive Office of the President

Office of the United States Trade Representative

National Security Council

National Economic Council

(See Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Aaron W. Cross	
Patrick A. Hunnicutt	
Kimberly M. Marsho	
Edmund F. Perry	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

See Addendum

Signature _____ Date _____

Printed Name and Title _____ See Page 50

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area TRD**

16. Specific Lobbying Issues

Electronic Commerce Trade Policy

World Trade Organization (WTO) Work Program on E-Commerce

WTO Negotiations Objectives Regarding E-Commerce

WTO Trade Classification

Asia Pacific Economic Cooperation

Ministerial and Heads of State Meetings

Free Trade Area of the Americas

Agenda and Issue Development

GATT Uruguay Round Implementation

GATT Government Procurement Code

Membership Expansion

Adherence to the GATT Government Procurement Code

Trade Agreements Act

North America Free Trade Agreement (NAFTA)

Implementation and Preservation

S. 1372 Export-Import Bank Reauthorization Act of 2002

U.S.-Vietnam Bilateral Trade Agreement

U.S.-Jordan Free Trade Agreement

U.S.-Singapore Free Trade Agreement

U.S.-Chile Free Trade Agreement

U.S.-Australia Free Trade Agreement

U.S.-New Zealand Free Trade Agreement

Export Controls Legislation and Regulations

Deemed Export Regulations

Microprocessor and Computer Export Regulations

S. 149 Export Administration Act of 2001

H.R. 2581 Export Administration Act of 2001

WTO GATS Negotiations

WTO-New Round

OECD Guidelines for Multinational Enterprises

Taiwan's Accession to the WTO

China's WTO Accession Implementation

H.R. 2149/S. 1104 Trade Promotion Authority Act of 2001

S. 2062 Comprehensive Trade Negotiating Authority Act of 2002

H.R. 3005 Bipartisan Trade Promotion Authority Act of 2001

H.R. 3009 Andean Trade Promotion and Drug Eradication Act

H.Res. 450 Relating to Consideration of the Senate Amendment to H.R. 3009 to Extend the Andean Trade Preference Act, to Grant Additional Trade Benefits Under the Act, and for Other Purposes

S. 643/H.R. 1484 United States-Jordan Free Trade Area Implementation Act

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area TRD**

16. Specific lobbying issues (Cont'd)

S. 935 United States-Commonwealth of Australia Free Trade Agreement Act of 2001

S. 943 United States-New Zealand Free Trade Agreement Act of 2001

S. 944 United States-Republic of Korea Free Trade Agreement Act of 2001

**Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area TRD**

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

Executive Office of the President (Cont'd)

Central Intelligence Agency

Department of Commerce

Bureau of Industry and Security

International Trade Administration

Department of Defense

Policy

National Security Agency

Department of State

Bureau of Western Hemisphere Affairs

Bureau of Economic and Business Affairs

Bureau of Political-Military Affairs

Bureau of East-Asian and Pacific Affairs

Bureau of European and Canadian Affairs

Bureau of Inter-American Affairs

Office of Under Secretary for Arms Control and International Affairs

Department of the Treasury

International Affairs

United States Customs Service

Internal Revenue Service

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area TRD**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
..... Paul R. Redifer
..... Adrienne G. Rhone
..... Susan M. Siemietkowski
..... Steven W. Stewart
..... Susan C. Tuttle
..... William H. Warner
..... Paul Forlenza
.....
.....
.....

Lobbying Report Addendum for Item 19
Issue Areas TAX and TRD

19. For registrants identifying foreign entities in the Lobbying Registration (Form LD-1, line 14) or any updates: In of each such foreign entity in the specific lobbying issues listed on line 16 above

Regarding Lines 14(a) and 14(b) of Form LD-1: None. Regarding Line 14(c) of Form LD-1, the term “direct interest” is not defined in the statute and its meaning remains ambiguous. IBM believes that its foreign subsidiaries have only an indirect and derivative interest in the lobbying activities covered by this Addendum. IBM’s foreign subsidiaries do not have the predominant interest in the matters for which IBM has engaged in lobbying activities since the parent company initiates, directs, finances and controls such activities and does not act merely as an agent for one or more of its subsidiaries. However, because the interpretation of “direct interest” remains uncertain we include a list of the major worldwide non-U.S. subsidiaries of the company. Depending on the meaning finally given to the statutory terms, one or more of these subsidiaries might be viewed as having a direct interest in one or more of the activities covered by this Addendum.

IBM World Trade Subsidiaries

IBM Argentina Sociedad Anonima	IBM Korea, Inc.
IBM Australia Limited	IBM de Mexico, S.A.
IBM Oesterreich Internationale Bueromaschinen Gesellschaft m.b.H.	IBM Nederland N.V.
International Business Machines of Belgium S.A.	IBM New Zealand Limited
IBM de Bolivia, S.A.	International Business Machines A/S (Norway)
IBM Brasil-Industria, Maquinas e Servicos Limitada	IBM del Peru, S.A.
IBM Bulgaria Ltd.	IBM Philippines, Inc.
IBM Canada Limited - IBM Canada Limitee	IBM Polska Sp.z.o.o.
IBM de Chile, S.A.C.	Companhia IBM Portuguesa, S.A.
IBM China Company Ltd.	IBM Romania SrL
IBM de Colombia, S.A.	IBM East Europe/Asia Ltd.
IBM Croatia Ltd.	IBM Singapore Pte. Ltd.
IBM Ceska Republika spol. s.r.o. (Czech Republic)	IBM Slovensko spol.s.r.o. (Slovak Republic)
IBM Danmark A/S	IBM Slovenija d.o.o. (Slovenia)
IBM Middle East FZE	IBM South Africa (Pty) Ltd.
IBM del Ecuador, C.A.	International Business Machines, S.A. (Spain)
Oy International Business Machines AB (Finland)	IBM Svenska Aktiebolag
Compagnie IBM France, S.A.	IBM(Schweiz)-IBM (Suisse)-IBM(Svizzera)-
IBM Deutschland GmbH	IBM (Switzerland)
IBM Hellas Information Handling Systems S.A. (Greece)	IBM Taiwan Corporation
International Business Machines Corporation Magyarorszagi Kft (Hungary)	IBM Thailand Co. Ltd.
IBM Ireland Limited	IBM (International Business Machines) Turk Limi Sirketi
IBM Israel Limited	IBM United Kingdom Holdings Limited
IBM Italia S.P.A.	IBM del Uruguay, S.A.
IBM Japan, Ltd.	IBM de Venezuela, S.A.

Registrant Name IBM Client Name Self

Information Update Page - Complete ONLY where registration information has changed.

20. Client new address

21. Client new principal place of business (if different from line 20)

City _____ State/Zip (or Country) _____

22. New general description of client's business or activities

LOBBYIST UPDATE

23. Name of each previously reported individual who is no longer expected to act as a lobbyist for the client

- Aaron W. Cross
- Paul Forlenza
- Edward A. Gillespie

ISSUE UPDATE

24. General lobbying issues previously reported that no longer pertain

AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Name	Address	Principal Place of Business (city and state or country)

26. Name of each previously reported organization that is no longer affiliated with the registrant or client

FOREIGN ENTITIES

27. Add the following foreign entities

Name	Address	Principal place of business (city and state or country)	Amount of contribution for lobbying activities

28. Name of each previously reported foreign entity that no longer owns, or controls, or is affiliated with the registrant or affiliated organization

Signature  Date 8-9-02

