

99 AUG 16 PM 3:43

H. D.

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	Telephone	E-mail (optional)	5. Senate ID #
Marcus P. Williams	(202) 515-5522		19877-12
7. Client Name <input checked="" type="checkbox"/> Self			6. House ID #
		31123000	

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	
<p>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 checked="" type="checkbox"/> ⇒ \$ _____ <small>Income (nearest \$20,000)</small></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>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>3,280,000</u> <small>Expenses (nearest \$20,000)</small></p> <p>14. REPORTING METHOD. Check box to indicate expense accounting method. See instructions for description of options.</p> <p><input checked="" 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 section 162(e) of the Internal Revenue Code</p>

Signature _____

Printed Name and Title _____ See Page 56

Registrant Name IBM Client Name Self

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 AGR (one per page)

16. Specific lobbying issues
H.R. 852/S. 777 Freedom to E-File Act

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
Christopher G. Caine		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
Adrienne G. Rhone		<input type="checkbox"/>
Susan M. Siemietkowski		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<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 _____

Printed Name and Title _____ See Page 56

Registrant Name IBM Client Name Self

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 BAN (one per page)

16. Specific lobbying issues

Electronic Benefits Transfer
Department of the Treasury and Federal Reserve Board Reports on
Electronic Benefits Transfer
Digital Signature

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

House of Representatives
Department of the Treasury
Comptroller of the Treasury
Federal Reserve Board

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

Name	Covered Official Position (if applicable)	New
Christopher G. Caine		<input type="checkbox"/>
Roger J. Cochetti		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
Brian J. Raymond		<input type="checkbox"/>
Adrienne G. Rhone		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ Sec Page 56

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

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>New</u>
Susan M. Siemietkowski		
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X

Registrant Name IBM Client Name Self

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 BUD (one per page)

16. Specific lobbying issues

IBM has lobbied for various Government Programs, including Government/ Private Sector Research and Development Programs, the Army Wholesale Logistics Modernization Program, and Amtrak. Please see General Lobbying Issue Area Codes DEF, RRR, SCI and TAX for the report on these issues.

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

See General Lobbying Issue Area Codes DEF, RRR, SCI and TAX

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

Name	Covered Official Position (if applicable)	New
See General Lobbying Issue		<input type="checkbox"/>
Area Codes DEF, RRR, SCI and TAX		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

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

See General Lobbying Issue Area Codes DEF, RRR, SCI and TAX

Signature _____ Date _____

Printed Name and Title _____ See Page 56

Registrant Name IBM Client Name Self

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 CPI (one per page)

16. Specific lobbying issues

- Year 2000 Conversion
- Electronic Funds Transfer
- Section 39 of the Federal Acquisition Regulations
- UNICITRAL Model Law of Electronic Transactions
- S. 461 Year 2000 Fairness & Responsibility Act

(Continued on Attached Continuation Sheet)

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

- House of Representatives
- Senate
- General Accounting Office
- Office of the Comptroller of the Currency

(Continued on Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)	New
P. Bai Akridge		<input type="checkbox"/>
Christopher G. Caine		<input type="checkbox"/>
Roger J. Cochetti		<input type="checkbox"/>
Timothy B. Hackman		<input type="checkbox"/>
Patrick A. Hunnicutt		<input type="checkbox"/>
Richard O. Lehmann		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ See Page 56

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

16. Specific lobbying issues

S. 738 Year 2000 Fairness in Litigation Act
H.R. 192 Year 2000 Consumer Protection Plan Act of 1999
H.R. 775 Year 2000 Readiness & Responsibility Act
S. 96 Year 2000 Act
S. 1138 Year 2000 Act
H.R. 1502 Year 2000 Act
H.R. 1599 Year 2000 Compliance Assistance Act
H.R. 1447 National Year 2000 Test Day Act
S. 314 Small Business Year 2000 Readiness Act
H.R. 1319 Year 2000 Fairness in Litigation Act
H.R. 1685 Internet Growth Development Act of 1999
Electronic Commerce
Electronic Authentication
S. 761 The Millennium Electronic Commerce Act
H.R. 1572 Digital Signature Act of 1999
H.R. 1320 Millennium Digital Commerce Act
H.R. 1714 Electronic Signatures in Global & National Commerce Act

Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area CPI

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

Securities and Exchange Commission
General Services Administration
Executive Office of the President
Office of Management and Budget
President's Council on Year 2000 Conversion
Small Business Administration
Office of the United States Trade Representative
U.S. Department of Commerce
U.S. Department of State
Federal Trade Commission

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>New</u>
Michael G. Oliva		
Edmund F. Perry		
Brian J. Raymond		
Adrienne G. Rhone		
Timothy J. Sheehy		
Susan M. Siemietkowski		
Susan C. Tuttle		
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X

Registrant Name IBM Client Name Self

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 CSP (one per page)

16. Specific lobbying issues

Electromagnetic Fields Research Program
Ergonomics Rulemaking
National Occupational Research Agenda
Video Display Terminal Health & Safety

(Continued on 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 Management and Budget

(Continued on Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)	New
Christopher G. Caine		<input type="checkbox"/>
Roger J. Cochetti		<input type="checkbox"/>
Linda C. Evans		<input type="checkbox"/>
Patrick A. Hunicutt		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Harriet P. Pearson		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ Sec Page 56

Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area CSP

16. Specific lobbying issues

Department of Health and Human Services

Rulemaking to Implement Medical Record and Privacy Provisions of Health Insurance
Portability and Accountability Act of 1996

Privacy

S. 809 Online Privacy Protection Act of 1999

S. 578 Health Care Personal Information Nondisclosure Act of 1999

S. 881 Medical Information Protection Act of 1999

S. 699 Telemarketing Fraud & Seniors Protection Act

H.R. 1685 Internet Growth & Development Act of 1999

H.R. 1686 Internet Freedom Act

H.R. 1057 Medical Information Privacy & Security Act

Internet Content Regulation

Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area CSP

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

Department of Commerce
Department of Justice
Federal Reserve Board
Federal Trade Commission
Department of Energy
Department of Health and Human Services
National Institute for Occupational Safety and Health
Occupational Safety and Health Administration
Office of the Comptroller of the Currency

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>New</u>
Edmund F. Perry		
Brian J. Raymond		
Adrienne G. Rhone		
Timothy J. Sheehy		
Susan S. Siemietkowski		
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X



Registrant Name IBM Client Name Self

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 CPT (one per page)

16. Specific lobbying issues

- H.R. 354 Collections of Information Antipiracy Act
- H.R. 1858 Consumer and Investor Access to Information Act of 1999
- H.R. 1907 American Inventors Protection Act of 1999
- PTO Government Corporation
- 18 Month Patent Application Publication

(Continued on 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

(Continued on Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)	New
Christopher G. Caine		<input type="checkbox"/>
Roger J. Cochetti		<input type="checkbox"/>
Timothy B. Hackman		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Harriet P. Pearson		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ See Page 56

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

16. Specific lobbying issues

H.R. 1907 American Inventors Protection Act (Cont'd)

Improved Reexamination Procedures

Patent Term Extensions

Prior User Rights

S. 1257 Copyright Damages Improvement of 1999

S. 1258 Patent Fee Integrity and Innovation Protection Act of 1999

S. 1259 Trademark Amendments Act of 1999

S. 1260 Copyright Technical Corrections

S. 1255 Anticybersquatting Consumer Protection Act

Uniform Commercial Code (UCC), Article 2B (proposed)

Uniform Computer Information Transactions Act (UCITA)

WTO Trade-Related Aspects of Intellectual Property (TRIPS)

Internet Domain Name

Internet Trademark

Internet Content

Software Patents

Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area CPT

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

Department of Commerce
Patent and Trademark Office

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>New</u>
Brian J. Raymond		
Adrienne G. Rhone		
Susan M. Siemietkowski		
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X

Registrant Name IBM Client Name Self

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 DEF (one per page)

16. Specific lobbying issues

- S. 1059/H.R. 1401 National Defense Authorization Act for Fiscal Year 2000
Army Wholesale Logistics Modernization Program
Acquisition Reform
- S. 1122 Department of Defense Appropriations Act for Fiscal Year 2000
Army Wholesale Logistics Modernization Program

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

House of Representatives
Senate
Department of Defense

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

Name	Covered Official Position (if applicable)	New
Christopher G. Caine		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
Brian J. Raymond		<input type="checkbox"/>
Adrienne G. Rhone		<input type="checkbox"/>
Susan M. Siemietkowski		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ See Page 56 _____

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

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>New</u>
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X
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 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 EDU (one per page)

16. Specific lobbying issues
Educational Reform
Educational Standards
Workforce Development
Elementary/Secondary Act Reauthorization

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

- Department of Education
Executive Office of the President
National Economic Council
Office of Science and Technology Policy
Office of the Vice President

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

Name	Covered Official Position (if applicable)	New
Christopher G. Caine		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
Brian J. Raymond		<input type="checkbox"/>
Adrienne G. Rhone		<input type="checkbox"/>
Susan M. Siemietkowski		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ See Page 56

Registrant Name IBM Client Name Self

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 ENG (one per page)

16. Specific lobbying issues

- Electricity Restructuring Legislation
 - S. 1047 Comprehensive Electricity Competition Act
 - S. 1048 Comprehensive Electricity Competition Tax Act
- Electricity Restructuring Regulation
- Energy Efficiency Programs for Office Equipment (Energy Star)

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

Senate
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)	New
Christopher G. Caine		<input type="checkbox"/>
Edward A. Gillespie		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
Brian J. Raymond		<input type="checkbox"/>
Adrienne G. Rhone		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ See Page 56

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>New</u>
Susan M. Siemietkowski		
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X

Registrant Name IBM Client Name Self

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 ENV (one per page)

16. Specific lobbying issues

- H.R. 1300 Recycle America's Land Act of 1999
- S. 1090 Superfund Program Completion Act of 1999
- Proposed EU Waste from Electrical and Electronic Equipment (WEE) Directive
- S. 547 Credit for Voluntary Reductions Act (Green House Gases)
- S. 882 Energy and Climate Policy Act of 1999

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

House of Representatives
Senate
Environmental Protection Agency

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

Name	Covered Official Position (if applicable)	New
Christopher G. Caine		<input type="checkbox"/>
Edward A. Gillespie		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
Brian J. Raymond		<input type="checkbox"/>
Adrienne G. Rhone		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ See Page 56

Registrant Name IBM Client Name Self

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 GOV (one per page)

16. Specific lobbying issues

OMB Circular A-76 (Government Cost Comparison Guidelines for Contracting with Private Sector)

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

Senate
Executive Office of the President
Office of Management and Budget
Office of Federal Procurement Policy

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

Name	Covered Official Position (if applicable)	New
Christopher G. Caine		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
Bryan J. Raymond		<input type="checkbox"/>
Adrienne G. Rhone		<input type="checkbox"/>
		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ See Page 56

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>New</u>
Susan M. Siemietkowski		
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X

Registrant Name IBM Client Name Self

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 HCR (one per page)

16. Specific lobbying issues

Health Care Reform Legislation
H.R. 216 Access to Quality Care Act of 1999
H.R. 448 Patient Protections Act of 1999
H.R. 358/S.6 Patients Bill of Rights Act of 1999
S. 326 Patients' Bill of Rights Act

(Continued on Attached Continuation Sheet)

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
Christopher G. Caine		<input type="checkbox"/>
Geri J. Colombaro		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Harriet P. Pearson		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
Brian J. Raymond		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ See Page 56

Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area HCR

16. Specific lobbying issues

Health Care Reform Legislation (Cont'd)

- S. 300 Patients' Bill of Rights Plus Act
- S. 1344 Patients Bill of Rights Act of 1999
- H.R. 2041 Patient Right to Obstetric and Gynecological Care Act of 1999
- H.R. 2042 Health Care Access, Affordability, and Quality Advisory Commission Act of 1999
- H.R. 2043 Patient Right to Unrestricted Medical Advice Act of 1999
- H.R. 2044 Patient Right to Pediatric Care Act of 1999
- H.R. 2045 Patient Right to Emergency Medical Care Act of 1999
- H.R. 2046 Patient Access to Information Act of 1999
- H.R. 2047 Small Business Access and Choice for Entrepreneurs Act of 1999
- H.R. 2089 Group Health Plan Review Standards Act of 1999

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>New</u>
Adrienne G. Rhone		
Susan M. Siemietkowski		
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X

Registrant Name IMM Client Name Self

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 IMM (one per page)

16. Specific lobbying issues

- Skills Availability – IT Industry Worker Shortage
- Technology Skills Shortage Task Force
- H.R. 1650/S.745 Border Improvement & Immigration Act

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

- House of Representatives
- Senate
- Department of Commerce
- Department of Labor

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

Name	Covered Official Position (if applicable)	New
Christopher G. Caine		<input type="checkbox"/>
Linda C. Evans		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Harriet P. Pearson		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
Brian J. Raymond		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ See Page 56

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

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>New</u>
Adrienne G. Rhone		
Susan M. Siemietkowski		
Steven W. Stewart		
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X

Registrant Name IBM Client Name Self

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 LBR (one per page)

16. Specific lobbying issues

- S. 702 Equal Pay Act
- H.R. 5411/S. 74 Paycheck Fairness Act
- H.R. 1302 The Sales Incentive Compensation Act
- Jeffords Inside Sales Draft Bill
- Reauthorization of Skills Standards Board

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

House of Representatives
Department of Labor

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

Name	Covered Official Position (if applicable)	New
Christopher G. Caine		<input type="checkbox"/>
Gerl J. Colombaro		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Harriet P. Pearson		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
Brian J. Raymond		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ See Page 56

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>New</u>
Adrienne G. Rhone		
Susan M. Siemietkowski		
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X
M. Kathryn Walsh		

Registrant Name IBM Client Name Self

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 RRR (one per page)

16. Specific lobbying issues

Amtrak
H.R. 2084/S. 1143 Department of Transportation and Related Agencies Appropriations for
Fiscal Year 2000
S. 1144 Surface Transportation Act of 1999
S. 712 Look, Listen and Live Stamp Act of 1999

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
Christopher G. Caine		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
Brian J. Raymond		<input type="checkbox"/>
Adrienne G. Rhone		<input type="checkbox"/>
Susan M. Siemietkowski		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ See Page 56

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

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>New</u>
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X
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 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 RET (one per page)

16. Specific lobbying issues

H.R. 1102 Comprehensive Retirement Security & Pension Reform Act

H.R. 1590 Retirement Security Act of 1999

S. 741 Pension Coverage and Portability Act

(Continued on Attached Continuation Sheet)

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
Christopher G. Caine		<input type="checkbox"/>
Geri J. Colombaro		<input type="checkbox"/>
Linda C. Evans		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Harriet P. Pearson		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ See Page 56

Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area RET

16. Specific lobbying issues

- S. 659/H.R. 1176 Pension Right to Know Act
- S. 1300 Older Workers Pension Protection Act of 1999
- H.R. 1793 21st Century Retirement Act
- S. 21 Social Security Solvency Act of 1999
- S. 1429 The Taxpayer Refund Act of 1999 (Pension Reform and Cash Balance Disclosure)
- H.R. 2488 Financial Freedom Act of 1999 (Pension Reform and Cash Balance Disclosure)

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>New</u>
Brian J. Raymond		
Adrienne G. Rhone		
Susan M. Siemietkowski		
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X

Registrant Name IBM Client Name Self

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 SCI (one per page)

16. Specific lobbying issues

Government/Private Sector R&D Partnerships

S. 1059/H.R. 1401 National Defense Appropriations Act for Fiscal Year 2000

Advanced Lithography Funding

S. 1062 National Defense Authorization Act for Fiscal Year 2000

Advanced Lithography Funding

Accelerated Strategic Computer Initiative (ASCI) (Continued on Attached Continuation Sheet)

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

House of Representatives

Senate

Department of Commerce

National Institute of Standards and Technology

Technology Administration

(Continued on Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)	New
Christopher G. Caine		<input type="checkbox"/>
Roger J. Cochetti		<input type="checkbox"/>
Timothy B. Hackman		<input type="checkbox"/>
Kathleen N. Kingscott		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
Brian J. Raymond		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ See Page 56

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

16. Specific lobbying issues

- S. 1062 National Defense Authorization Act for Fiscal Year 2000 (Cont'd)
 - Navy Wide Internet Funding
 - Joint Warfare Experimentation Program
- S. 1186 Energy and Water Appropriations Act for Fiscal Year 2000
 - Accelerated Strategic Computer Initiative
- S. 1217 Departments of Commerce, Justice, and State Appropriations Act for Fiscal Year 2000
 - Advanced Technology Program
- H.R. 2684 Veterans Affairs and Housing and Urban Development Appropriations Act for Fiscal Year 2000
 - High Performance Computing and Communications Initiative (HPCCI), National Science Foundation Funding, and Next Generation Internet
- S. 1305 National Research Investment Act of 1998
- S. 296 Federal Research Investment Act
- H.R. 2086 Networking & Information Technology Research & Development Act
- S. 1407 Technology Administration Authorization Act for Fiscal Years 2000, 2001, and 2002

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 Energy
Defense Programs
Department of Defense
Defense Advanced Research Projects Agency
Department of the Navy
Executive Office of the President
Office of Science and Technology Policy
National Economic Council

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>New</u>
Adrienne G. Rhone		
Susan M. Siemietkowski		
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X
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 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

H.R. 2488 Financial Freedom Act of 1999
S. 1429 The Taxpayer Refund Act of 1999
Pension Fund Surplus Internal Revenue Code Section 420
Education Exemption Internal Revenue Code Section 127

(Continued on Attached Continuation Sheet)

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

House of Representatives
Senate
Department of Treasury

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

Name	Covered Official Position (if applicable)	New
Christopher G. Caine		<input type="checkbox"/>
Roger J. Cochetti		<input type="checkbox"/>
Linda C. Evans		<input type="checkbox"/>
Patrick A. Hunnicutt		<input type="checkbox"/>
Richard O. Lehmann		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<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 _____

Printed Name and Title _____ See Page 56

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

16. Specific lobbying issues

S. 216/H.R. 1633 Repeal Limitation on Use of Foreign Tax Credits Under the Corporate
Alternative Minimum Tax
S. 680 and H.R. 835 Extend the R&D Tax Credit and Raise Alternative Incremental
Research Credit (AIRC)
Accelerate Look Through Treatment for Dividends of 10/50 Companies
H.R. 2018 International Tax Simplification Act
Administration FY2000 Budget
Corporate Tax Shelters
Revision of Internal Revenue Code Subpart F on Deferral of Taxation
Negotiation and Ratification of Bilateral Income Tax Treaties
Treasury Rules on Hybrid Branches
Treasury "Check-in-the-Box" Regulations
Treasury R&D Tax Credit Proposed Regulations
Taxation of Software Rules (Section 18) Regulations
Taxation of Internet Transactions and Software
S. 659 and H.R. 1176 Pension Cash Balance and Disclosure
Pension Fund Surplus Internal Revenue Code Section 420
Education Exemption Internal Revenue Code Section 127
S. 456/H.R. 838 Information Technology Training Tax Credits
Omnibus Budget Reconciliation
Fundamental Tax Reform

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>New</u>
Michael G. Oliva		
Edmund F. Perry		
Brian J. Raymond		
Adrienne G. Rhone		
Timothy J. Sheehy		
Susan M. Siemietkowski		
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X
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 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 TEC (one per page)

16. Specific lobbying issues

International Telecommunications
WTO Basic Telecommunications Agreement Implementation
Asia Pacific Economic Cooperation (APEC) Telecommunications Policies
Internet Governance
Regulatory Treatment of Internet Service Providers
(Continued on 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
(Continued on Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)	New
P. Bai Akridge		<input type="checkbox"/>
Christopher G. Caine		<input type="checkbox"/>
Roger J. Cochetti		<input type="checkbox"/>
Timothy B. Hackman		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<input type="checkbox"/>
		<input type="checkbox"/>

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

Signature _____ Date _____

Printed Name and Title _____ See Page 56

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

16. Specific lobbying issues

S. 1043 Internet Regulatory Freedom Act of 1999
H.R. 1685 Internet Growth and Development Act of 1999
H.R. 1686 Internet Freedom Act
H.R. 1291 Internet Access Charge Prohibition Act of 1999
S. 877 Broadband Internet Regulatory Relief Act
S. 1043 Internet Regulatory Freedom Act
S. 1004/H.R. 1746 Schools and Libraries Internet Access Act
Implementation of Telecommunications Act of 1996
FCC Proceedings
School and Libraries Fund (e-rate)
Deployment of Advanced Telecommunications Services
Access Charges
Universal Service

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 Commerce
National Telecommunications and Information Administration
Department of State
International Communications and Information Policy (CIP)
Federal Communications Commission
National Economic Council

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>New</u>
Edmund F. Perry		
Brian J. Raymond		
Adrienne G. Rhone		
Susan M. Siemietkowski		
Steven W. Stewart		
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X
M. Kathryn Walsh		
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 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 TRD (one per page)

16. Specific lobbying issues

Supercomputer Export Control Liberalization Regulations
IMF Replenishment
H.R. 2606/S. 1234 Foreign Operations, Export Financing and Related Programs Appropriations Act for Fiscal Year 2000
Export Import Bank

(Continued on 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
(Continued on Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)	New
Christopher G. Caine		<input type="checkbox"/>
Roger J. Cochetti		<input type="checkbox"/>
Aaron W. Cross		<input type="checkbox"/>
Richard O. Lehmann		<input type="checkbox"/>
Michael G. Oliva		<input type="checkbox"/>
Edmund F. Perry		<input type="checkbox"/>
(Continued on Attached Continuation Sheet)		<input type="checkbox"/>
		<input type="checkbox"/>

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 56

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

16. Specific lobbying issues

H.R. 2606/S. 1234 (Cont'd)

Overseas Private Investment Corporation

TDA Funding

Trade Financing

H.J. Res. 57/S.J. Res. 27. Disapproving Extension of Nondiscriminatory Treatment

(Normal Trade Relations Treatment) to the

Products of the People's Republic of China

Customs

Rules of Origin

Classification

Software Valuation

Antidumping

Information Technology Agreement Negotiations

Emerging Markets

Encryption Export Control Regulations

Taiwan Import Standards

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

GATT Services 2000 Agenda

North America Free Trade Agreement (NAFTA)

Implementation and Preservation

Vietnam Normalization

Multilateral Agreement on Investment Negotiations

China's Accession to the WTO

OECD Anti-Bribery Convention

Export Control Legislation and Regulations

H.R. 850 Security & Freedom through Encryption Act

WTO Work Program on E-Commerce

WTO-GATS-Services 2000

S. 798 Promote Reliable On-line Transactions to Encourage Commerce & Trade Act

H.R. 1401/S. 1059 National Defense Authorization Act for Fiscal Year 2000

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

National Economic Council
National Security Agency
Central Intelligence Agency
Department of Commerce
Bureau of Export Administration
International Trade Administration
Department of Defense
Policy
Department of State
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
Department of the Treasury
International Affairs
United States Customs 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>New</u>
Michael G. Oliva		
Edmund F. Perry		
Brian J. Raymond		
Adrienne G. Rhone		
Susan M. Siemietkowski		
Susan C. Tuttle		
Gregory W. Waddell	Legislative Director for Senator Connie Mack	X

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: Interest 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 Buemaschinen 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 Aktiefbolag
Compagnie IBM France, S.A.	IBM(Schweiz)-IBM (Suisse)-IBM(Svizzera)- IBM (Switzerland)
IBM Deutschland GmbH	IBM Taiwan Corporation
IBM Hellas Information Handling Systems S.A. (Greece)	IBM Thailand Co. Ltd.
International Business Machines Corporation Magyarorszagi Kft (Hungary)	IBM (International Business Machines) Turk Limited Sirketi
IBM Ireland Limited	IBM United Kingdom Holdings Limited
IBM Israel Limited	IBM del Uruguay, S.A.
IBM SEMEA S.A. (Italy)	IBM de Venezuela, S.A.
IBM Japan, Ltd.	

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

Paul Forlenza

ISSUE UPDATE

24. General lobbying issues previously reported that no longer pertain

CAW POS

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	Ownership percentage in client

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

Signature  Date 8-13-97

Printed Name and Title Christopher G. Caine, Vice President of Governmental Programs