

99 AUG -6 PM 3:45

**LOBBYING REPORT**

H.D.

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

1. Registrant Name Securities Industry Association			
2. Address <input type="checkbox"/> Check if different than previously reported 1401 I Street, NW Suite 1000 Washington, DC 20005			
3. Principal Place of Business (if different from line 2) City: New York 120 Broadway State/Zip (or Country) NY			
4. Contact Name Stuart J. Kaswell	Telephone (202) 296-9410	E-mail (optional) skaswell@sia.com	5. Senate ID # 34774.12
7. Client Name <input checked="" type="checkbox"/> Self			6. House ID #

**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><b>12. Lobbying Firms</b></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"/> ⇨ \$ _____  <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><b>13. Organizations</b></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>2,400,200</u>  <small>Expenses (nearest \$20,000)</small></p> <p><b>14. REPORTING METHOD.</b> Check box to indicate expense accounting method. See instructions for description of options.</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA definitions only</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code</p> <p><input checked="" type="checkbox"/> Method C. Reporting amounts under section 162(c) of the Internal Revenue Code</p>
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Signature Stuart J. Kaswell  
 Printed Name and Title Stuart J. Kaswell, Senior Vice President and General Counsel

Registrant Name Sec. Industry Assoc. 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

See Rider BAN 16

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

See Rider BAN 17

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

Name	Covered Official Position (if applicable)	Yes
See Rider BAN 18		<input type="checkbox"/>
		<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

Signature *Stuart J. Kaswell* Date August 6, 1999  
Printed Name and Title Stuart J. Kaswell, Senior Vice President and General Counsel

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**Rider BAN.16.**

**16. Specific Lobbying issues:**

**Bills:**

HR 10/ S. 900, Financial Services Modernization Act of 1999  
S. 753, the Financial Services Act of 1999.

**Executive Branch Issues:**

Proposal by Financial Accounting Standards Board on pooling-of-interests accounting treatment of corporate mergers.

SEC plain English proposal for account statements.

**Rider BAN.17**

**17. Houses of Congress and Federal agencies contacted**

United States House of Representatives

United States Senate

Securities and Exchange Commission

White House

**Rider BAN 18.**

**18. Name and title of each employee who acted as a lobbyist.**

Storrs, Carol J. - Vice President

Costantino, Louis A. - Assistant Vice President and Director, Congressional Relations and Grassroots Activities

Judge, J. Steven - Senior Vice President, Government Affairs

Lackritz, Marc E. - President

Paret, Jonathan R. - Vice President and Legislative Counsel

Kaswell, Stuart J. - Senior Vice President and General Counsel

Rives, Elizabeth L. - Vice President, Policy Analysis and Communications

Spollman, James D. - Senior Vice President, Corporate Communications

Michaelis, Daniel V. - Assistant Vice President, Corporate Communications

Roesser, Kristin H. - Vice President, Legislative Affairs

Sorcher, Alan -- Assistant Vice President and Assistant General Counsel. *Covered Official Position: Counsel, Federal Reserve Board, January 1993 to March, 1999. (NEW)*

Robinson, Rachel, Vice President. *Covered Official Position: Director of Speaker's Operations, Office of the Speaker of the House of Representatives, January 1996 to December 1998 (NEW)*

Marventano, David - Vice President and Senior Director of Government Affairs. *Covered Official Position: Chief of Staff, Congressman William Paxson, October 1995 to January 1999. (NEW)*

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Registrant Name Sec. Industry Assoc. 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

See Rider BUD 16

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

See Rider BUD 17

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

Name	Covered Official Position (if applicable)	New
See Rider BUD 18		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
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		<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 *Stuart J. Kaswell* Date August 6, 1999

Printed Name and Title Stuart J. Kaswell, Senior Vice President and General Counsel

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**Rider BUD.16**

**16. Specific Lobbying issues:**

**Bills:**

HR 2441, Fairness in Securities Transactions Act  
HR 1256, Savings and Investment Relief Act of 1999

**Congressional Issues:** Possible legislation to repeal or modify transaction fees under Section 31 of the Securities Act of 1933 as applied to dealer-to-dealer and riskless principal transactions.

**Executive Branch Issues:**

Possible legislation to repeal or modify transaction fees under Section 31 of the Securities Act of 1933 as applied to dealer-to-dealer and riskless principal transactions;

Administration's FY2000 Budget proposals regarding:

current accrual of market discount by accrual method taxpayers; limit conversion of character of income from constructive ownership transactions with respect to partnership interests (and legislation introduced in the House on constructive ownership); modify rules for debt-financed portfolio stock; modify and clarify straddle rules; defer interest deduction and original issue discount (OID) on certain convertible debt; tax issuance of tracking stock; deny dividends received deduction for certain preferred stock; modify basis adjustment rules for partnership distributions; disallow interest on debt allocable to tax-exempt obligations; require accrual of time value element on forward sale of corporate stock; subject investment income of trade associations to tax; tighten the substantial understatement penalty for large corporations; increase penalties for failure to file correct information returns; modify substantial understatement penalty for corporate tax shelters; deny certain tax benefits to persons avoiding income tax as a result of tax avoidance transactions; deny deductions for certain tax advice and impose an excise tax on certain fees received; impose excise tax on certain rescission provisions and provisions guaranteeing tax benefits; preclude taxpayers from taking tax positions inconsistent with the form of their transactions; tax income from corporate tax shelters involving tax-indifferent parties; provide statutory hedging and other rules to ensure business property is treated as ordinary property; simplify the foreign tax credit limitation for dividends from 10/50 companies; interest treatment for dividends paid by certain regulated investment companies to foreign persons (and provision on this topic in international tax simplification bills)

**Rider BUD.17**

**17. Houses of Congress and Federal agencies contacted**

House of Representatives  
Senate  
White House  
Department of Treasury  
Securities and Exchange Commission

**Rider BUD.18**

**18. Name and title of each employee who acted as a lobbyist.**

Judge, J. Steven - Senior Vice President, Government Affairs  
Lackritz, Marc E. - President  
Paret, Jonathan R. - Vice President and Legislative Counsel  
Kaswell, Stuart J. - Senior Vice President and General Counsel  
McClanahan, Patricia - Vice President and Director, Tax Policy *Covered Official Position: Tax Counsel, Senate Finance Committee, Feb. 1992-June 1997.*

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Costantino, Lou - Manager, Government Affairs.

Lies, Elizabeth Vice President and Director, Retirement Policy (NEW)

Marventano, David -- Vice President and Senior Director of Government Affairs. *Covered Official Position:*  
*Chief of Staff, Congressman William Paxson, October 1995 to January 1999 (NEW)*

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Registrant Name Sec. Industry Assoc. 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 CDT (one per page)

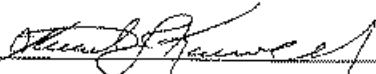
16. Specific lobbying issues  
See Rider CDT 16

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

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

Name	Covered Official Position (if applicable)	New
<u>See Rider CDT 18</u>		<input type="checkbox"/>
		<input type="checkbox"/>
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		<input type="checkbox"/>

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

Signature  Date August 6, 1999  
Printed Name and Title Stuart J. Kaswell, Senior Vice President and General Counsel

**Rider CDT.16**

**16. Specific Lobbying issues:**

Congressional Issues:

Possible legislation to reauthorize the Commodities Futures Trading Commission – limitations on CFTC jurisdiction over swaps and financial derivatives. (No bill introduced as of this filing).

Executive Branch Issues:

Same as Congressional issues.

**Rider CDT.17**

**17. Houses of Congress and Federal agencies contacted**

House of Representatives

Senate

US Department of Treasury

SEC

CFTC

**Rider CDT.18.**

**18. Name and title of each employee who acted as a lobbyist.**

Kaswell, Stuart J. - Senior Vice President and General Counsel

Quinn, Gerald J. - Vice President and Associate General Counsel

Paret, Jonathan P. - Vice President and Legislative Counsel.

Lackritz, Marc E. - President.

Judge, J. Steven – Senior Vice President, Government Affairs (NEW)

Costantino, Louis A. Jr., Manager, Assistant Vice President and Director, Congressional Relations and Grassroots Activities

Registrant Name Sec. Industry Assoc. 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 COM (one per page)

16. Specific lobbying issues

See Rider COM 16

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

See Rider COM 17

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

Name	Covered Official Position (if applicable)	Sex
See Rider COM 18		<input type="checkbox"/>
		<input type="checkbox"/>
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		<input type="checkbox"/>
		<input type="checkbox"/>

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

Signature  Date August 6, 1999

Printed Name and Title Stuart J. Kaswell, Senior Vice President and General Counsel

**Rider COM.16**

**16. Specific Lobbying Issues:**

**Executive Branch Issues:**

Request that the Federal Communications Commission forebear from applying the last sentence of Section 212 of the Communication Act because of unnecessary restraints that it imposes on communications carriers' directors who are officers of affiliates of underwriters.

**Rider COM.17**

**17. Houses of Congress and Federal agencies contacted**  
Federal Communications Commission

**Rider COM.18**

**18. Name and title of each employee who acted as a lobbyist.**

Kramer, George R. - Vice President and Associate General Counsel

Kaswell, Stuart J. - Senior Vice President and General Counsel

Registrant Name Sec. Industry Assoc. 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

See Rider CPI 16

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

See Rider CPI 17

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

Name	Covered Official Position (if applicable)	Yes
See Rider CPI 18		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
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		<input type="checkbox"/>

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

Signature *Stuart J. Kaswell* Date August 6, 1999

Printed Name and Title Stuart J. Kaswell, Senior Vice President and General Counsel

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**Rider CPL16**

**16. Specific Lobbying issues:**

**Bills:**

Congressional Issues: Securities regulatory issues concerning technology, such as electronic mail and record retention policy at the SEC; digital signatures.

Year 2000 conversion (coordinating securities industry conversion effort).

Privacy of customer financial information.

**Executive Branch Issues:**

Year 2000 conversion.

Conversion to trade date-plus one settlement cycle;

decimalization of securities and options prices;

**Rider CPL17**

**17. Houses of Congress and Federal agencies contacted**

House of Representatives

Senate

SEC

**Rider CPL18**

**18. Name and title of each employee who acted as a lobbyist.**

Judge, J. Steven - Senior Vice President

Lackritz, Marc E. - President

Roesser, Kristin H. -Vice President, Legislative Affairs

Michaelis, Daniel V. - Assistant Vice President, Corporate Communications

Spellman, James D. - Senior Vice President, Corporate Communications

Kaswell, Stuart J. - Senior Vice President and General Counsel

Kursman, Scott C. Assistant Vice President and Assistant General Counsel

Paret, Jonathan R. - Vice President and Legislative Counsel

Panchery, John - Vice President and Director, Systems and Technology

Costantino, Louis - Assistant Vice President and Director, Congressional Relations and Grassroots Activities.

Robinson, Rachel - Vice President. *Covered Official Position: Director of Speaker's Operations, Office of the Speaker of the House of Representatives, January 1996 to December 1998 (NEW)*

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Registrant Name Sec. Industry Assoc. 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 FIN (one per page)

16. Specific lobbying issues

See Rider FIN 16

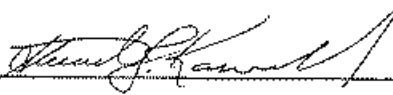
17. House(s) of Congress and Federal agencies contacted  Check if None

See Rider FIN 17

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

Name	Covered Official Position (if applicable)	New
See Rider FIN 18		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
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		<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 August 6, 1999  
Printed Name and Title Stuart J. Kaswell, Senior Vice President and General Counsel

Rider FIN.16

16. **Specific Lobbying issues:**

Bills:

S. 1189, Microcap Fraud Prevention Act  
HR 2441, Fairness in Securities Transactions Act  
HR 1256, Savings and Investment Relief Act of 1999  
HR 1225, U.S. Patent and Trademark Office Reauthorization Act, FY 2000  
HR 4321, the Financial Information Privacy Act of 1998.

Congressional Issues:

Proposals to Senate Banking Committee for Securities Markets Enhancement Act, including revision of federal and state licensing of broker-dealer agents and investment advisers, revisions to Section 16 of the Securities Exchange Act, Section 17(a) of the Investment Company Act, Section 206(3) of the Investment Advisers Act, and related changes to ERISA;  
arbitration of employment disputes;  
qualified immunity for reporting on Forms U-4 and U-5;  
proposed changes to SEC rules 17a-3 and 17a-4 (books and records proposal);  
access fees charged by the Consolidated Tape Association;  
Year 2000 Conversion effort particularly briefings on conversion effort and industry testing;  
Concerns about abuses in the "microcap" market, and role of clearing firms with regard to that market;  
Reduction in Section 31 fees;  
Patentability of financial products, trading systems and proprietary models;  
Extended trading hours on U.S. exchanges;  
SEC "aircraft carrier" disclosure rules for public offerings;  
Protection of data and data bases from misappropriation;  
Pooling of interests accounting treatment for mergers.

Executive Branch Actions:

Arbitration of employment disputes;  
qualified immunity for reporting on Forms U-4 and U-5;  
Reform to rules under Section 17(a) of the Investment Company Act and Section 206(3) of the Investment Advisers Act;  
Regulation of mini-tender offers;  
Pooling of interests accounting treatment for mergers;  
access fees charged by the Consolidated Tape Association;  
World Trade Organization and access of U.S. broker-dealers to foreign markets;  
company registration and prospectus delivery issues;  
proposed revisions to the securities offering process under the Securities Act of 1933;  
interpretations of net capital rules and proposals to revise SEC net capital requirements to allow use of value-at-risk models;  
extended trading hours on U.S. exchanges;  
broker compensation issues arising out of Tully Report;  
regulation of takeovers and corporate communications;  
proposals by NASD for cease-and-desist authority;  
derivatives and related regulatory issues (alternative regulated entity for derivatives activities);  
systems for addressing customer complaints to broker-dealers;  
broker-dealer retention of e-mail and interpretation of Exchange Act Rule 17a-3;  
proposed changes to SEC rules 17a-3 and 17a-4 (books and records proposal);  
national market system issues including order execution issues, off-board trading rules and SEC-mandated audit trail for the Nasdaq market;  
promulgation of investment adviser rules under NSMIA;  
regulation of alternative trading systems;

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SEC prospectus disclosure proposals, including SEC "aircraft carrier" disclosure rules;  
soft dollar payments among broker-dealers and other market participants; equity repurchase agreements;  
need for improved coordination of Self-regulatory organizations' examinations;  
possible consolidation or restructuring of self-regulatory organizations;  
Year 2000 conversion effort;  
regulation of broker-dealer proprietary trading systems and alternative trading systems;  
NASD collection of fees under Section 31 of the Securities Exchange Act of 1934 and proposals to reduce  
Section 31 fees;  
information required to be maintained by fiduciaries such as investment advisers under Rule 17a-3;  
modification of restrictions on principal transactions under rule 206(3) of the Advisers Act;  
exemption from bonding requirements of Section 412 of ERISA;  
HHS standards for access to customer account information to assist state enforcement of child support orders.  
report on regulatory examination process;  
report on securities industry's capacity to coordinate information technology projects;  
decimalization of securities and options prices;  
15c2-11 rule proposal and related rule proposals concerning microcap fraud abuses;  
proposals for firm detection of microcap fraud;  
agency cross-trading restrictions under ERISA;  
implementation of amended rules for clearing firms;  
suitability and other securities regulatory issues related to customer trading through Internet-based brokerage  
accounts;  
retail customer suitability issues;  
broker-dealer advertising practices;  
modifications to SEC Rule 17a-5 regarding disclosure by broker-dealers of Year 2000 preparedness;  
disclosure of 401(k) fees to consumers;  
fee structure of Consolidated Tape Association;  
SEC proposed operational capability rule;  
SEC Year 2000 preparedness disclosure by broker-dealers;  
bank regulatory proposals regarding money laundering;  
suitability standards for Internet broker-dealers;  
SEC staff's views on hedge accounting principles;  
proposals to SEC regarding filing requirements for certain mutual fund advertising and sales literature;  
proposals to SEC regarding mutual fund fees;  
Year 2000 systems reporting by investment advisers;  
Possible revisions to SEC Rule 15a-6;  
Proposals by the NASD and private-sector bodies to improve trade reporting and transparency in the corporate  
debt markets;  
Possible changes to insider trading rules (Rules 10b-5 and 14e3);  
Suitability standards for Internet brokers;  
SEC plain English proposal for account statements;  
Conversion to trade date-plus one settlement cycle;  
Financial Stability forum of the G-7 nations.

**Rider FIN.17**

**17. Houses of Congress and Federal agencies contacted**

House of Representatives;  
Senate;  
SEC;  
Federal Reserve Board;  
U.S. Treasury.

**Rider FIN.18**

**18. Name and title of each employee who acted as a lobbyist.**

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Costantino, Louis A. - Assistant Vice President and Director, Congressional Relations  
Judge, J. Steven - Senior Vice President, Government Affairs  
Lackritz, Marc E. - President  
Paret, Jonathan P. - Vice President and Legislative Counsel  
Kaswell, Stuart J. - Senior Vice President and General Counsel  
Rives, Elizabeth L. - Vice President, Policy Analysis and Communications  
Spellman, James D. - Senior Vice President, Corporate Communications  
Michaelis, Daniel V. - Assistant Vice President, Corporate Communications  
Kramer, George R. - Vice President and Associate General Counsel  
Roesser, Kristin H. - Vice President, Legislative Affairs  
Barry, Daniel J. - Director, State Regulation and Legislation  
Poppalardo, Judith C. - Vice President and Associate General Counsel  
Quinn, Gerald J. - Vice President and Associate General Counsel  
Strongin, David G. - Vice President and Director, International Finance  
Plessner, Fredda L. - Vice President and Associate General Counsel  
Gannon, Robert F. - Vice President, Management Services  
Udoff, Michael D. - Vice President and Associate General Counsel  
Kursman, Scott C. - Assistant Vice President and Assistant General Counsel  
Panchery, John - Vice President and Director, Systems and Technology  
McClanahan, Patricia, Vice President and Director, Tax Policy. *Covered Official Position: Tax Counsel, Senate Finance Committee, Feb. 1992-June 1997*  
Sorcher, Alan -- Assistant Vice President and Assistant General Counsel. *Covered Official Position: Counsel, Federal Reserve Board, January 1993 to March, 1999. (NEW)*  
Maurello, John. J. - Vice President and Director, Marketing and Membership Services;  
Robinson, Rachel, Vice President. *Covered Official Position: Director of Speaker's Operations, Office of the Speaker of the House of Representatives, January 1996 to December 1998 (NEW)*  
Marventano, David -- Vice President and Senior Director of Government Affairs. *Covered Official Position: Chief of Staff, Congressman William Paxson, October 1995 to January 1999 (NEW)*

Registrant Name Sec. Industry Assn. 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

See Rider RET 16


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

See Rider RET 17

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

Name	Covered Official Position (if applicable)	New
See Rider RET 18		<input type="checkbox"/>
		<input type="checkbox"/>
		<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

Signature  Date August 6, 1999  
Printed Name and Title Stuart J. Kaswell, Senior Vice President and General Counsel

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**Rider RET.16**

**16. Specific Lobbying issues:**

**Bills:**

S. 625 - Bankruptcy Reform Act of 1999 (protection of Individual Retirement Accounts in bankruptcy)  
S. 741 - Pension Coverage and Portability Act  
H.R. 1102 - Comprehensive Retirement Security and Pension Reform Act  
S. 646 - Retirement Savings Opportunity Act  
H.R. 1546 - (Same as above)

**Executive Branch Actions:**

Treasury and IRS meetings on SIMPLE plan regulations, and regulations relating to IRAs, Roth IRAs, and the Education IRA;  
exemption from bonding requirements of Section 412 of ERISA;  
agency cross-trading restrictions under ERISA;  
affiliated transactions under ERISA;  
interpretations of Section 404(c) of ERISA;  
401(k) fees disclosure;  
Soft dollar regulation by Department of Labor.]

**Rider RET.17**

**18. Houses of Congress and Federal agencies contacted**

House of Representatives  
Senate  
White House  
Department of Treasury  
Internal Revenue Service

**Rider RET.18**

**18. Name and title of each employee who acted as a lobbyist.**

Judge, J. Steven - Senior Vice President, Government Affairs  
Lackritz, Marc E. - President  
Spellman, James D. - Senior Vice President, Corporate Communications  
Michaelis, Daniel V. - Assistant Vice President, Corporate Communications  
McClanahan, Patricia - Vice President and Director, Tax Policy. *Covered Official Position: Tax Counsel, Senate Finance Committee, Feb. 1992-June 1997*  
Udoff, Michael D. - Vice President and Associate General Counsel.  
Rives, Elizabeth L. - Vice President, Policy Analysis and Communications  
Liess, Elizabeth - Vice President and Director, Retirement Policy (NEW)  
Robinson, Rachel, Vice President. *Covered Official Position: Director of Speaker's Operations, Office of the Speaker of the House of Representatives, January 1996 to December 1998 (NEW)*  
Kaswell, Stuart J. - Senior Vice President and General Counsel (NEW)

Registrant Name Sec. Industry Assoc. 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  
See Rider TAX 16

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

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

Name	Covered Official Position (if applicable)	New
<u>See Rider TAX 18</u>		<input type="checkbox"/>
		<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 entry in the specific issues listed on line 16 above  Check if None

Signature *Stuart J. Kaswell* Date August 6, 1999  
Printed Name and Title Stuart J. Kaswell, Senior Vice President and General Counsel

**Rider TAX.16**

**16. Specific Lobbying issues:**

Bills:

S. 1433, Sales Tax Safety Net and Technical Funding Act  
H.R. 2488 (Financial Freedom Act of 1999)  
S. — (Taxpayer Refund Act of 1999) (no number yet)  
S. 1164 and H.R. 2018 (International Tax Simplification for American Competitiveness Act of 1999)  
H.R. 618 (permanent extension of subpart F reform for financial services firms)  
H.R. 672, and S. 572 (concerning hybrid arrangements)  
S. 593 and H.R. 1840 (Small Savers Act of 1999)(dividend, interest and capital gains exclusions)  
H.R. 2350 (American Values Tax Savings Plan for the 21<sup>st</sup> Century)  
H.R. 2020, S. 1160 (Tax Relief for Working Americans Act of 1999)  
H.R. 1420 (Individual Tax Simplification Act of 1999)  
H.R. 1525 (Independent Contractor Clarification Act of 1999)  
Abusive Tax Shelter Shutdown Act of 1999  
P.L. 105-277, Division J, The Tax and Trade Relief Extension Act of 1998, of the Omnibus Consolidated and  
Emergency Supplemental Appropriations Act, 1999  
Internal Revenue Service Restructuring and Reform Act of 1998 (provisions relating to due date for Forms  
1099, capital gains, and accountant-client privilege)

Congressional Issues:

International tax rules generally concerning foreign tax credits (interest allocation rules, 10/50 companies,  
overall domestic loss); withholding tax treatment of earnings of regulated investment companies paid to foreign  
persons; advance pricing agreements; reform of subpart F with respect to the active financing income of  
financial services firms; reform of subpart F more generally;  
Due date for filing information returns generally (including proposal to move general due date to February 15);  
Corporate rate reductions;  
Exclusion from gross income of interest and dividend income;  
Corporate and individual capital gains issues generally (e.g., rate reductions, exclusions of first \$5,000 from  
income);  
Electronic filing of information returns;  
Internet taxation and telephone tax issues generally;  
Self-employment tax issues relating to partnerships and limited liability companies  
Internal Revenue Code ("IRC") Section 61111. (provisions relating to capital gains, registration of confidential  
tax shelters, constructive sales, international tax, and securities transactions).

Executive Branch Actions

IRS and Treasury Notice 98-35 (concerning hybrid arrangements);

Proposal to subject investment income of trade associations to tax;

Administration's FY2000 Budget proposals regarding:

current accrual of market discount by accrual method taxpayers; limit conversion of character of  
income from constructive ownership transactions with respect to partnership interests (and legislation  
introduced in the House on constructive ownership); modify rules for debt-financed portfolio stock;  
modify and clarify straddle rules; defer interest deduction and original issue discount (OID) on certain  
convertible debt; tax issuance of tracking stock; deny dividends-received deduction for certain preferred  
stock; modify basis adjustment rules for partnership distributions; disallow interest on debt allocable to  
tax-exempt obligations; require accrual of time value element on forward sale of corporate stock;  
subject investment income of trade associations to tax; tighten the substantial understatement penalty  
for large corporations; increase penalties for failure to file correct information returns; modify  
substantial understatement penalty for corporate tax shelters; deny certain tax benefits to persons  
avoiding income tax as a result of tax avoidance transactions; deny deductions for certain tax advice

Addendum

and impose an excise tax on certain fees received; impose excise tax on certain rescission provisions and provisions guaranteeing tax benefits; preclude taxpayers from taking tax positions inconsistent with the form of their transactions; tax income from corporate tax shelters involving tax-indifferent parties; provide statutory hedging and other rules to ensure business property is treated as ordinary property; simplify the foreign tax credit limitation for dividends from 10/50 companies; interest treatment for dividends paid by certain regulated investment companies to foreign persons (and provision on this topic in international tax simplification bills)

Proposed regulations under IRC section 482 that would provide rules for allocating and sourcing the income of a US or foreign taxpayer from a global dealing operation in securities;  
Regulations under Section 1441 of the IRC (and other sections) (TDs 8733 and 834);  
IRS and Treasury Notice 98-16 (concerning reporting and withholding obligations with respect to payments to foreign persons);  
Proposed regulations concerning withholding on stated interest accruing between payment dates;  
IRS and Treasury Notice 99-8, IRS Revenue Procedure 98-27 (concerning model qualified intermediary agreement and related matters);  
IRS and Treasury Notice 98-5. (concerning the availability of foreign tax credits in certain transactions);  
Report of the President's Working Group on Financial Markets, *Hedge Funds, Leverage and the Lessons of Long-Term Capital Management*;  
Internal Revenue Code (IRC) section 1092 of the IRC (regulations concerning the qualified covered call option rules; practitioner proposals to revise rules);  
IRC section 1259 (regulation project concerning constructive sales).  
International tax rules generally concerning foreign tax credits (interest allocation rules, 10/50 companies, overall domestic loss);  
withholding tax treatment of earnings of regulated investment companies paid to foreign persons;  
advance pricing agreements;  
reform of subpart F, especially with respect to the active financing income of financial services firms;  
reform of subpart F more generally.  
Due date for filing information returns generally (including proposal to move general due date to February 15);  
Corporate rate reductions;  
Exclusion from gross income of interest and dividend income;  
Corporate and individual capital gains issues generally (e.g., rate reductions, exclusions of first \$5,000 from income);  
Electronic filing of information returns;  
Internet taxation and telephone tax issues  
Self-employment tax issues relating to partnerships and limited liability companies; House, Senate and Treasury;  
taxation of Internet commerce.

**Rider Tax.17**

**17. Houses of Congress and Federal agencies contacted**

House of Representatives  
Senate  
Department of Treasury  
Internal Revenue Service  
White House  
Advisory Commission on Electronic Commerce

**Rider TAX.18**

**18. Name and title of each employee who acted as a lobbyist.**

Judge, J. Steven - Senior Vice President, Government Affairs

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Lackritz, Marc E. - President  
Rives, Elizabeth L. - Vice President, Policy Analysis and Communications  
Spellman, Jams D. - Senior Vice President, Corporate Communications  
Michaelis, Daniel V. - Assistant Vice President, Corporate Communications  
McClanahan, Patricia - Vice President and Director, Tax Policy. *Covered Official Position: Tax Counsel, Senate Finance Committee, Feb. 1992-June 1997*  
Costantino, Lou - Assistant Vice President and Director, Congressional Relations  
Roesser, Kristin H. - Vice President, Legislative Affairs  
Paret, Jonathan R. - Vice President and Legislative Counsel  
Liess, Elizabeth - Vice President and Director, Retirement Policy (NEW)  
Marventano, David - Vice President and Senior Director of Government Affairs. *Covered Official Position: Chief of Staff, Congressman William Paxson, October 1995 to January 1999 (NEW)*  
Robinson, Rachel, Vice President. *Covered Official Position: Director of Speaker's Operations, Office of the Speaker of the House of Representatives, January 1996 to December 1998 (NEW)*

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Addendum

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Registrant Name Sec. Industry Assoc. 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)

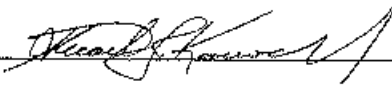
16. Specific lobbying issues  
See Rider TEC 16

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

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

Name	Covered Official Position (if applicable)	New
<u>See Rider TEC 18</u>		<input type="checkbox"/>
		<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

Signature  Date August 6, 1999  
Printed Name and Title Stuart J. Kaswell, Senior Vice President and General Counsel

**Rider TEC.16**

**16. Specific Lobbying issues:**

Bills:

HR 2281 and S. 761, The Digital Millennium Commerce Act;  
HR 1714, Electronic Authorization Act;  
HR 775/ S. 96, The Y2K Act;  
S. 921, Electronic Securities Transaction Act.

Congressional Issues:

Year 2000 conversion (coordinating securities industry conversion effort);  
National standards for digital signatures.

**Rider TEC.17**

**17. Houses of Congress and Federal agencies contacted**

House of Representatives;  
Senate;  
Securities and Exchange Commission.

**Rider TEC.18**

**18. Name and title of each employee who acted as a lobbyist.**

Judge, J. Steven - Senior Vice President  
Roesser, Kristin P. - Vice President, Legislative Affairs  
Costantino, Louis - Assistant Vice President and Director, Congressional Relations and Grassroots Activities  
Paret, Jonathan R. - Vice President and Legislative Counsel  
McClanahan, Patricia - Vice President and Director, Tax Policy. *Covered Official Position: Tax Counsel, Senate Finance Committee, Feb. 1992-June 1997.*  
Plessner, Fredda - Vice President and Associate General Counsel  
Panchery, John - Vice President and Director, Systems and Technology  
Lackritz, Marc E. - President  
Kaswell, Stuart J. - Senior Vice President and General Counsel  
Kramer, George - Vice President and Associate General Counsel (NEW)  
Kursman, Scott - Vice President and Associate General Counsel (NEW)  
Gannon, Robert - Vice President, Management Services (NEW)  
Liess, Elizabeth - Vice President and Director, Retirement Policy (NEW)

Registrant Name Sec. Industry Assoc. 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

See Rider TRD 16

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

See Rider TRD 17

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

Name	Covered Official Position (if applicable)	New
See Rider TRD 18		<input type="checkbox"/>
		<input type="checkbox"/>
		<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

Signature *Stuart J. Kaswell* Date August 6, 1999  
Printed Name and Title Stuart J. Kaswell, Senior Vice President and General Counsel

**Rider TRD.16**

**16. Specific Lobbying issues:**

Executive Branch Actions:

Money-laundering rules.  
Chinese accession to the World Trade Organization  
Bilateral trade agreement between the U.S. and Vietnam.  
Financial Stability forum of the G-7 nations.

**Rider TRD.17**

**17. Houses of Congress and Federal agencies contacted**

Department of the Treasury  
Office of the United States Trade Representative  
Federal Reserve Board

**Rider TRD.18**

**18. Name and title of each employee who acted as a lobbyist.**

Judge, J. Steven - Senior Vice President  
Lackritz, Marc E. - President  
Spellman, James D. - Vice President, Corporate Communications  
Michaelis, Daniel V. - Assistant Vice President, Corporate Communications  
Roesser, Kristin P. - Vice President, Legislative Affairs  
Kramer, George R. - Vice President and Associate General Counsel  
Quinn, Gerald J. - Vice President and Associate General Counsel  
Sorcher, Alan - Assistant Vice President and Assistant General Counsel. *Covered Official Position: Counsel, Federal Reserve Board, January 1993 to March, 1999. (NEW).*  
Poppalardo, Judith - Vice President and Associate General Counsel  
Paret, Jonathan R. - Vice President and Legislative Counsel (NEW).  
Strongin, David G. - Vice President and Director, International Finance  
Kaswell, Stuart J. - Senior Vice President and General Counsel  
McClanahan, Patricia - Vice President and Director, Tax Policy. *Covered Official Position: Tax Counsel, Senate Finance Committee, Feb. 1992-June 1997.*

Registrant Name Sec. Industry Assoc. 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

Toohy, Frank  
Kaufman, Hope

**ISSUE UPDATE**

24. General lobbying issues previously reported that no longer pertain

CIV LBR

**AFFILIATED ORGANIZATIONS**

25. Add the following affiliated organization(s)

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

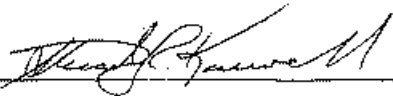
26. Name of each previously reported organization that is no longer affiliated with the registrant or client

**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 August 6, 1999  
Printed Name and Title Stuart J. Kaswell, Senior Vice President and General Counsel