

LOBBYING REPORT

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

1. Registrant Name

Covington & Burling

2. Address Check if different than previously reported.

1201 Pennsylvania Avenue, N.W.

3. Principal Place of Business (if different from line 2)

City: **Washington**

State/Zip (or Country) **DC/200**

4. Contact Name **Roderick A. DeArment** Telephone **202-662-5900** Email (optional) **rdearment@cov.com**

5. Senate ID #
11195-710

7. Client Name Self
Retirement Income Coalition

6. House ID #
31827058

TYPE OF REPORT 8. Year 2001 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 Act

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

12. Lobbying Firms

INCOME relating to lobbying activities for this reporting period was:

Less than \$10,000

\$10,000 or more ⇒ \$ 40,000
Income (nearest \$20,000)

Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income for the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client.)

13. Organizations

EXPENSES relating to lobbying activities for reporting period were:

Less than \$10,000

\$10,000 or more ⇒ \$ _____
Expenses (nearest \$20,000)

14. **REPORTING METHOD.** Check box to expense accounting method. See instruction description of options.

Method A. Reporting amounts using LDI definitions only

Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code

Method C. Reporting amounts under 162 Internal Revenue Code

Signature _____

Date February 11, 2002

Printed Name and Title **Roderick A. DeArment**

[Redacted]

Registrant Name Covington & Burling

Client Name Retirement Income Coalition

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

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

16. Specific lobbying issues

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

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

House of Representatives
Senate
Department of Treasury

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

Name	Covered Official Position (if applicable)
John M. Vine	Partner
Roderick A. DeArment	Partner

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

Signature _____ Date February 11, 2002
Printed Name and Title **Roderick A. DeArment**

[REDACTED]

Registrant Name Covington & Burling

Client Name Retirement Income Coalition

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 cli

ISSUE UPDATE

24. General lobbying issues previously reported that **no longer** pertain

AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Name	Address	Principal Place of Busi (city and state or coun

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	Ow per clie

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

Signature



Date

February 11, 2002

Printed Name and Title

Roderick A. DeArment

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