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Washington, DC 20515

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Office of Public Records
232 Hart Building
Washington, DC 20510

SECRETARY OF THE

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LOBBYING REPORT

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

1. Registrant Name International Business Machines Corporation (IBM)			
2. Address <input type="checkbox"/> Check if different than previously reported 1301 K Street, N.W., Washington, D.C. 20005-3307			
3. Principal Place of Business (if different from line 2) City: Armonk State/Zip (or Country) New York 10504			
4. Contact Name Marcus P. Williams	Telephone (202) 515-5522	E-mail (optional)	5. Senate ID 19877
7. Client Name <input checked="" type="checkbox"/> Self			6. House ID 31123

TYPE OF REPORT 8. Year 2001 Midyear (January 1-June 30) OR Year End (July 1-

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

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

12. Lobbying Firms	13. Organizations
INCOME relating to lobbying activities for this reporting period was:	EXPENSES relating to lobbying activities for this period were:
Less than \$10,000 <input type="checkbox"/>	Less than \$10,000 <input type="checkbox"/>
\$10,000 or more <input type="checkbox"/> ⇒ \$ _____ Income (nearest \$20,000)	\$10,000 or more <input checked="" type="checkbox"/> ⇒ \$ <u>2,730,000</u> Expenses (nearest \$20,000)
Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).	14. REPORTING METHOD. Check box to indicate accounting method. See instructions for descriptive reporting method. <input checked="" type="checkbox"/> Method A. Reporting amounts using LDA de <input type="checkbox"/> Method B. Reporting amounts under section Internal Revenue Code <input type="checkbox"/> Method C. Reporting amounts under section Internal Revenue Code

Signature _____



Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which t engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each c 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 Res Development Programs, Customs Modernization Program, and Amtrak.

Please see General Lobbying Area Codes RRR, SCI, and TRD for the report on these issues.

17. House(s) of Congress and Federal agencies contacted Check if None
See General Lobbying Issue Area Codes RRR, SCI, and TRD

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

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

19. Interest of each foreign entity in the specific issues listed on line 16 above Check if None
See General Lobbying Issue Area Codes RRR, SCI, and TRD

Signature _____ Date _____



Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

Cybersecurity

Freedom of Information Act (FOIA)

Critical Infrastructure Information Sharing Exemptions

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

House of Representatives

Senate

Executive Office of the President

National Security Council

Office of Management and Budget

General Services Administration

Check if None

U.S. Department of Commerce

Critical Infrastructure Assurance (CIIA)

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

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

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

Check if None

Signature _____ Date _____



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

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

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

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

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

16. Specific lobbying issues
Commercial Privacy
Internet Privacy

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
Office of the President
Office of the Vice President (See Attached Continuation Sheet)

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

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

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

Signature _____ Date _____



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
Federal Trade Commission



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

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

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

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

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

- 16. Specific lobbying issues
 - Software Patents
 - Business Methods Patents
 - Data Rights Management
 - Database Protection
 - Internet Domain Names

(See Attached Continuation Sheet)

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

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

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

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

Signature _____ Date _____

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

16. Specific lobbying issues

- H.Res. 110 Providing that it shall not be in Order in the House of Representatives to Consider Certain Funding Measures for the USPTO
- H.R. 740 Patent and Trademark Office Reauthorization Act
- H.R. 614 Copyright Technical Corrections Act of 2001
- H.R. 615 Intellectual Property Technical Amendments Act of 2001
- H.R. 741/S. 407 Madrid Protocol Implementation Act
- H.R. 1332 Business Methods Patent Improvement Act of 2001
- H.R. 1333 Patent Improvement Act of 2001
- H.R. 1866 To Amend Title 35, United States Code, to Clarify the Basis for Granting Requests for Reexamination of Patents
- H.R. 1886 To Amend Title 35, United States Code, to Provide for Appeals by Third Parties in Certain Patent Reexamination Proceedings
- H.R. 2100 Twenty-First Century Distance Learning Enhancement Act
- H.R. 2231 Patent Reexamination Enhancement Act of 2001
- H.R. 2047 Patent and Trademark Authorization Act of 2002
- S. 320 Intellectual Property and High Technology Technical Amendments Act of 2001
- S. 487 Technology, Education, and Copyright Harmonization Act of 2001



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

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

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



Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

- H.R. 1 No Child Left Behind Act of 2001
- S. 1 An Original Bill to Extend Programs and Activities Under the Elementary and Secondary Education Act of 1965
- Education Reform
- Educational Standards
- Workforce Development

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
- House of Representatives
- Senate

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patrick A. Hunnicutt	
Edgar H. McCulloch III	Counsel/Legislative Assistant to Senator Joseph I. Lieberman
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
M. Kathryn Walsh	

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

Signature _____ Date _____

Form LD-2 (Rev. 6/98)



Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

- Electricity Restructuring
- Energy Efficiency Programs for Office Equipment (Energy Star)
- Low Frequency Emission Standards - European Union

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

Senate

Office of the United States Trade Representative

Department of Energy

Office of International Energy Policy

Federal Energy Regulatory Commission

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

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

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

Signature _____ Date _____



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>
Paul R. Redifer	
Adrienne G. Rhone	
Susan M. Siemietkowski	



Registrant Name IBM Client Name Self

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

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

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

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

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

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

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

Signature _____ Date _____



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

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

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

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

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

16. Specific lobbying issues

H.R. 2458/S. 803 E-Government Act of 2001

European Standards for Electronics

H.R. 721/S. 1152 Truthfulness, Responsibility and Accountability in Contracting Act

H.R. 2227 To Amend Title 10, United States Code, to Give Certain Rights to Department of Defense Employees with Respect to Actions or Determinations Under Office of Management & Budget

Circular A-76

Accessibility - Section 508 Requirements

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

Check if None

Senate

Executive Office of the President

Office of the United States Trade Representative

Office of Management and Budget

Office of Federal Procurement Policy

General Services Administration

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Edward A. Gillespie	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Edgar H. McCulloch III	Counsel/Legislative Assistant to Senator Joseph I. Lieberman
Edmund F. Perry	
(See Attached Continuation Sheet)	

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

Check if None

Signature _____ Date _____

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

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

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



Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which t engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each c 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
S. 1052 Bipartisan Patient Protection Act
S. 889 Bipartisan Patients' Bill of Rights Act of 2001
H.R. 526 Bipartisan Patient Protection Act of 2001
Life Sciences Policy
S.318 Genetic NonDiscrimination in Health Insurance and Employment Act

17. House(s) of Congress and Federal agencies contacted Check if None
House of Representatives
Senate
Office of Management and Budget
Department of Health and Human Services
National Institutes of Health

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Geri J. Colombaro	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Edgar H. McCulloch III	Counsel/Legislative Assistant to Senator Joseph I. Lieberman
Edmund F. Perry	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____



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

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

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

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

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

16. Specific lobbying issues

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

17. House(s) of Congress and Federal agencies contacted
House of Representatives
Senate
Department of Labor
Occupational Safety and Health Administration

Check if None

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Geri J. Colombaro	
Edward A. Gillespie	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Edgar H. McCulloch III	Counsel/Legislative Assistant to Senator Joseph I. Lieberman
Edmund F. Perry	
(See Attached Continuation Sheet)	

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

Check if None

Signature _____ Date _____



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

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
..... Brian J. Raymond		
..... Paul R. Redifer		
..... Adrienne G. Rhone		
..... Susan M. Siemietkowski		
..... Gregory W. Waddell		
..... M. Kathryn Walsh		
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Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

S. 824 Medication Errors Reduction Act of 2001

17. House(s) of Congress and Federal agencies contacted
House of Representatives
Senate
Department of Health and Human Services
Agency for Healthcare Research and Quality
The Centers for Medicare and Medicaid Services

Check if None
Executive Office of the President
Office of Management and Budget
Council of Economic Advisors

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Edgar H. McCulloch III	Counsel/Legislative Assistant to Senator Joseph I. Lieberman
Edmund F. Perry	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____



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

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

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



Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which t
engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each c
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. 2299/S. 1178 Department of Transportation and Related Agencies Appropriations for
Fiscal Year 2002

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

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

House of Representatives

Senate

Check if None

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

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

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

Check if None

Signature _____ Date _____

Printed Name and Title

See Page 43



Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues
H.R. 10 Comprehensive Retirement Security and Pension Reform Act of 2001
Raise 401(k) Limits

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

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

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

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

Signature _____ Date _____



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

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

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



Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant was engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code and 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

H.R. 2311/S. 1171 Energy and Water Appropriations Act for Fiscal Year 2002

Accelerated Strategic Computer Initiative (ASCI)

Physical Science Research

(See Attached Continuation Sheet)

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

Check if None

House of Representatives

Senate

Department of Commerce

Department of Energy

Executive Office of the President

Office of Science and Technology Policy

National Science Foundation

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patrick A. Hunnicutt	
Kathleen N. Kingscott	
Edmund F. Perry	
Edgar H. McCulloch III	Counsel/Legislative Assistant to Senator Joseph I. Lieberman
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Check if None

Signature _____ Date _____

Printed Name and Title

See Page 43



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

16. Specific lobbying issues

H.R. 2500/S. 1215 Departments of Commerce, Justice, and State Appropriations Act for Fi
Year 2002

National Weather Service Information Technology Programs

Advanced Technology Program

H.R. 2620/S. 1216 Veterans Affairs and Housing and Urban Development Appropriations /
for Fiscal Year 2002

Information Technology Services Procurement

National Science Foundation Funding

HUD Information Technology Services

Life Sciences Research Funding



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

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
Paul R. Redifer		
Adrienne G. Rhone		
Timothy J. Sheehy		
Susan M. Siemietkowski		
Gregory W. Waddell		
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 tl engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each c information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- S. 801/H.R. 1600 Repeal Limitation on Use of Foreign Tax Credits Under the Corporate Alternative Minimum Tax
- H.R. 2520 Abusive Tax Shelter Shutdown Act of 2001
- Revision of Internal Revenue Code Subpart F on Deferral of Taxation
- Negotiation and Ratification of Bilateral Income Tax Treaties
- U.S. - Japan Tax Treaty
- U.S. - Brazil Tax Treaty

(See Attached Continuation Sheet)

17. House(s) of Congress and Federal agencies contacted
- House of Representatives
 - Senate
 - Department of Treasury
 - Department of Commerce
 - Office of the United States Trade Representative
 - Department of State

Check if None

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

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

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

Signature _____ Date _____

Form LD-2 (Rev. 6/98)

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

16. Specific lobbying issues

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

Fundamental Tax Reform

Internet Taxation

European Union Proposal for Taxation of Electronic Commerce

H.R. 1836 Economic Growth and Tax Relief Act of 2001

Active Financing Exception to Subpart F

H.R. 41/S.1 To amend the Internal Revenue Code of 1986 to Permanently Extend the
Research Credit and to Increase the Rates of the Alternative Incremental Credit



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

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

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



Registrant Name IBM

Client Name Self

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

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

16. Specific lobbying issues

International Telecommunications

WTO Basic Telecommunications Agreement Implementation

Asia Pacific Economic Cooperation (APEC) Telecommunications Policies

Regulatory Treatment of Internet Service Providers

International Charging Arrangements for Internet Services

Electronic Commerce Trade Policy

(See Attached Continuation Sheet)

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

House of Representatives

Senate

Executive Office of the President

Office of the United States Trade Representative

Department of Commerce

(See Attached Continuation Sheet)

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

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

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

Signature _____

Date _____

Printed Name and Title

See Page 43



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

16. Specific lobbying issues

Implementation of Telecommunications Act of 1996

FCC Proceedings

Deployment of Advanced Telecommunications Services

Access Charges

Universal Service

North American Numbering Plan

E-Rate

Spectrum allocation

H.R. 1542 Internet Freedom and Broadband Deployment Act of 2001



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

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

Department of State

International Communications and Information Policy (CIP)

Federal Communications Commission



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

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>N</u>
..... Adrienne G. Rhone
..... Susan M. Siemietkowski
..... Steven W. Stewart
..... 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 t engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each c information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues
H.R. 2590 Treasury, Postal, General Government Appropriations Act for
Fiscal Year 2002 (Customs Modernization)
Trade Financing
Customs Classification
Information Technology Agreement Negotiations
Emerging Markets
(See Attached Continuation Sheet)

17. House(s) of Congress and Federal agencies contacted Check if None
House of Representatives
Senate
Executive Office of the President
Office of the United States Trade Representative
National Security Council
National Economic Council
(See Attached Continuation Sheet)

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

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

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

Signature _____ Date _____



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

16. Specific Lobbying Issues

Electronic Commerce Trade Policy
S.Con.Res. 37/H.Con.Res. 132 To Stress Importance of Promoting E-Commerce
WTO Work Program on E-Commerce
WTO Negotiations Objectives Regarding E-Commerce
WTO Trade Classification
Asia Pacific Economic Cooperation
Ministerial and Heads of State Meetings
Free Trade Area of the Americas
Agenda and Issue Development
GATT Uruguay Round Implementation
GATT Government Procurement Code
Membership Expansion
Adherence to the GATT Government Procurement Code
Trade Agreements Act
North America Free Trade Agreement (NAFTA)
Implementation and Preservation
U.S.-Vietnam Bilateral Trade Agreement
U.S.-Jordan Free Trade Agreement
U.S.-Singapore Free Trade Agreement
U.S.-Chile Free Trade Agreement
U.S.-Australia Bilateral Trade Agreement
Export Controls Legislation and Regulations
Deemed Export Regulations
S. 149 Export Administration Act of 2001
H.R. 1553 To Repeal Export Controls on High Performance Computers
WTO-GATS-Services 2000
WTO-New Round
OECD Guidelines for Multinational Enterprises
Taiwan's Accession to the WTO
China's Accession to the WTO
H.J. Res. 50 Disapproving Extension of Nondiscriminatory Treatment
(Normal Trade Relations Treatment) to the Products of the People's Republic of China
H.R. 1467 To Withdraw Nondiscriminatory Treatment (Normal Trade Relations) from the
People's Republic of China
H.R. 1497 To Revoke the Authority to Extend Permanent Normal Trade Relations to the
People's Republic of China
H.Con.Res. 73/S.Con.Res. 27 Opposing Beijing's Bid to Host 2008 Olympic Games
H.R. 2149/S. 1104 Trade Promotion Authority Act of 2001



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

16. Specific lobbying issues (Cont'd)

- S. 599 Permanent Trade Promotion Authority and Market Access Act of 2001
- H.R. 1446 Standard Trade Negotiating Authority Act of 2001
- S. 136 Fast Trade Negotiating Authority Act
- S.J.Res. 16/H.J.Res. 51 Approving Extension of Nondiscriminatory Treatment to the Product Of the Socialist Republic of Vietnam
- H.J.Res.55 Disapproving the Extension of Waiver Authority Contained in Section 402(c) of Trade Act of 1974 with Respect to Vietnam
- S. 643/H.R. 1484 United States-Jordan Free Trade Area Implementation Act
- S. 935 United States-Commonwealth of Australia Free Trade Agreement Act of 2001
- S. 943 United States-New Zealand Free Trade Agreement Act of 2001
- S. 944 United States-Republic of Korea Free Trade Agreement Act of 2001



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

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

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
 Office of Under Secretary for Arms Control and International Affairs
Department of the Treasury
 International Affairs
 United States Customs Service
Internal Revenue Service



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

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

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



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: Int of each such foreign entity in the specific lobbying issues listed on line 16 above

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

IBM World Trade Subsidiaries

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

ISSUE UPDATE

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

DEF

IMM

AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Name	Address	Principal Place of (city and state or

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

FOREIGN ENTITIES

27. Add the following foreign entities

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

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

Signature Timothy A. Shulby Date 8/14/01

Printed Name and Title Timothy J. Sheehy, Director, Networked Economy Policy

Form LD-2 (Rev. 6/98)

F

