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LOBBYING REPORT

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

1. Registrant Name International Business Machines Corporation (IBM)			
2. Address <input type="checkbox"/> Check if different than previously reported 1301 K Street, N.W., Washington, D.C. 20005-3307			
3. Principal Place of Business (if different from line 2) City: Armonk State/zip (or country) New York 10504			
4. Contact Name Marcus P. Williams	Telephone (202) 515-5522	E-mail (optional) marcwill@us.ibm.com	5. Senate ID #: 19877-12
7. Client Name <input checked="" type="checkbox"/> Self			6. House ID #: 31123000

TYPE OF REPORT 8. Year 2005 Midyear (January 1-June 30) OR Year End (July 1-December 3)

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

12. Lobbying Firms	13. Organizations
INCOME relating to lobbying activities for this reporting period was: Less than \$10,000 <input type="checkbox"/> \$10,000 or more <input type="checkbox"/> ⇨ \$ _____ Income (nearest \$20,000)	EXPENSES relating to lobbying activities for this reporting period were: Less than \$10,000 <input type="checkbox"/> \$10,000 or more <input checked="" type="checkbox"/> ⇨ \$ <u>3,140,000</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 description of <input checked="" type="checkbox"/> Method A. Reporting amounts using LDA definition <input type="checkbox"/> Method B. Reporting amounts under section 6033 Internal Revenue Code <input type="checkbox"/> Method C. Reporting amounts under section 162(e) 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 the registrant is engaged in lobbying on behalf of the client during the reporting period. **Using a separate page for each code** information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

IBM has lobbied for various Government Programs, including Amtrak, Customs Modernization Program, and Government/Private Sector Research and Development Programs

Please see General Lobbying Area Codes DEF, GOV, HCR, HOM, RRR, and SCI for the report on these issues.

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

House of Representatives
Senate

See General Lobbying Issue Area Codes DEF, GOV, HCR, HOM, RRR, and SCI

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 DEF, GOV, HCR, HOM, RRR, and SCI	

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, GOV, HCR, HOM, RRR, and SCI

Signature _____ Date _____

Printed Name and Title See Page 28

Form LD-2 (Rev. 6/198)

0000381007

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 CPI (one per page)

16. Specific lobbying issues

Cybersecurity Research and Development

Freedom of Information Act (FOIA)

Critical Infrastructure Information Sharing

Government Evaluation/Certification of Security Products

National Strategy to Secure Cyberspace

Security-Related Standards

Corporate Governance - Security

Security Technology Mandates

Structure of Department of Homeland Security

S. 1350 Wireless 411 Privacy Act

PL 107-296, Title 8, Subtitle G, Support Antiterrorism by Fostering Effective Technologies Act (SAFE)

Risk Sharing for Homeland Security Technology and Services

Use of Open Source Software by U.S. Government

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

Check if None

House of Representatives

Senate

Executive Office of the President

Homeland Security Council

National Security Council

Office of Management and Budget

(See Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patricia J. Edington	
Timothy B. Hackman	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Timothy J. Sheehy	

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 28

8000381000



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 co** information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

Open Source Software

Open Source Use in the Public Sector

Patent Quality

H.R. 2795 Patent Act of 2005

(See Attached Continuation Sheet)

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

House of Representatives

Senate

Check if None

Department of Commerce

Patent Trademark Office

Department of Defense

Department of State

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Cheryl L. Bruner	
Patricia J. Edington	
Timothy B. Hackman	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Timothy J. Sheehy	
Marcus P. Williams	

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 28

0101850000

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

16. Specific lobbying issues

Patent Reexamination

Post-Patent-Grant Review

Software Patents

Smart Buy (Federal Software Procurement Regulation)

0000381011



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 co** information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

Privacy

Spyware

Radio Frequency Identification Education (RFID)

S. 1408 Identity Theft Protection Act

Security Breach Notification/Security Standards

S. 1332 Personal Data Privacy and Security Act

House of Representatives Commerce Committee - Staff Discussion Draft on data protection

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

Check if None

House of Representatives

Senate

Department of Commerce

International Trade Administration

Federal Trade Commission

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patricia J. Edington	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Timothy J. Sheehy	
Christopher J. Mustain	
Kathleen N. Kingscott	
Marija Zivanovic-Smith	
David N. Barnes	
Roslyn Docktor	

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

Check if None

Signature _____

Date _____

0000381012

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 co information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

H.R. 1815/S. 1042 National Defense Authorization Act, 2006

Enterprise Resource Planning (Navy)

eArmy University

Business Management Modernization

Enterprise Combat Support System (Air Force)

General Funds Enterprise Business System

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)
Christopher G. Caine	
Edward A. Gillespie	
Patricia J. Edington	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Steven W. Stewart	
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 28 _____

1000381013

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 co information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues
Educational Standards
Workforce Development
Innovation (Talent)

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

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
David N. Barnes	
Patricia J. Edington	
Edgar H. McCulloch III	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Christopher J. Mustain	
Kathleen N. Kingscott	

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 28

0000381014

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 co** information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

H.R. 3058 Transportation/Treasury/HUD/Judiciary/District of Colombia/Independent Agencies Approv Act, 2006

Buy American Act exclusion for IT Products

H.R. 1815/S. 1042 National Defense Authorization Act, 2006

Competitive Sourcing Provisions

Use of GSA Client Support Centers

Use of Government-Wide Acquisition Vehicles

Accessibility

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

Check if None

House of Representatives

Department of Defense

Senate

Office of Procurement Polic

Executive Office of the President

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	
Patricia J. Edington	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Steven W. Stewart	
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 28 _____

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Registrant Name IBM

Client Name Self

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

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

16. Specific lobbying issues

H.R. 747 National Health Information Incentive Act of 2005

Health Information Technology

H.R. 2234 21st Century Health Information Act of 2005

S. 16 Affordable Health Care Act

S. 544 Patient Safety and Quality Improvement Act of 2005

S. 1227 Health Information Technology Act of 2005

S. 1223 Information Technology for Health Care Quality Act

H.R. 3010 Labor/HHS/Education Appropriations Act

S. 1418 Wired for Healthcare Quality Act

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

House of Representatives

Senate

Executive Office of the President

Department of Health and Human Services

Centers for Disease Control and Prevention

National Institutes of Health

Center for Medicare/Medicaid Services

Human Resource and Services Administration

Agency for Healthcare Research and Quality

Food and Drug Administration

Check if None

Department of Defense

Domestic Policy Council

National Economic Council

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
David N. Barnes	
Patricia J. Edington	
Edgar H. McCulloch III	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	

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

Check if None

Signature _____

Date _____

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

15. General issue area code **HOM** (one per page)

16. Specific lobbying issues

H.R. 2360 Homeland Security Appropriations Act, 2006

Customs Modernization

Flood Map Modernization

H.R. 1817 Department of Homeland Security Authorization Act, 2006

World Customs Organization Framework of Standards to Secure and Facilitate Trade

Air Cargo Security

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

Check if None

House of Representatives

Senate

Department of Homeland Security

Bureau of Customs and Border Protection

Transportation Security Administration

Border & Transportation Security

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Roslyn Docktor	
Patricia J. Edington	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Steven W. Stewart	
William H. Warner	
Kimberly M. Marsho	

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 28

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Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues
Innovation (Talent)
 H1B Training Grants
 Science Talent Retention

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

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
David N. Barnes	
Patricia J. Edington	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Marija Zivanovic-Smith	
Christopher J. Mustain	
Kathleen N. Kingscott	

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 28

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Registrant Name IBM

Client Name Self

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

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

16. Specific lobbying issues

S. 1356 Medicare Value Purchasing Act of 2005

Health Information Technology

Innovation (Infrastructure)

Health Information Technology

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

Check if None

House of Representatives

Senate

Department of Health and Human Services

Agency for Healthcare Research and Quality

Centers for Medicare and Medicaid Services

Health Resources and Services Administration

Food and Drug Administration

Centers for Disease Control and Prevention

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
David N. Barnes	
Patricia J. Edington	
Edgar H. McCulloch III	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Christopher J. Mustain	
Kathleen N. Kingscott	

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 28

Form LD-2 (Rev.6198)

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Registrant Name IBM Client Name Self

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

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

16. Specific lobbying issues

H.R. 3058 Transportation/Treasury/HUD/Judiciary/District of Colombia/Independent Agencies Appropriation Act, 2006

Amtrak Funding

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	
Patricia J. Edington	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Steven W. Stewart	
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 28 _____

Form LD-2 (Rev.6198)

0000381020



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

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

16. Specific lobbying issues

H.R. 2830 Pension Protection Act of 2005

H.R. 2831 Pension Preservation and Portability Act of 2005

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	
David N. Barnes	
Patricia J. Edington	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Marija Zivanovic-Smith	

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 28 _____

Form LD-2 (Rev.6198)

1000381021

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

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

- 16. Specific lobbying issues
- Defense and Civilian DOE
- Accelerated Strategic Computer Initiative (ASCI)
- Civilian DOE Computer Simulation Technology
- Physical Science Research and Development

(See Attached Continuation Sheet)

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

- House of Representatives
- Senate
- Executive Office of the President
 - Office of Science and Technology Policy
- Defense Advanced Research Projects Agency
 - Office of Management and Budget
- Department of Energy
 - Defense Programs
 - Office of Science
 - Office of Advanced Scientific Computing Research

- Check if None
- Department of Defense
- National Science Foundation
- Sciences and Engineering

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Yolanda L. Comedy	
Patricia J. Edington	
Kathleen N. Kingscott	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Christopher J. Mustain	

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 28

0000381022

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

16. Specific lobbying issues

H.R. 28 High-Performance Computing Revitalization Act of 2005

High Performance Computing Research

H.R. 2862 Science, State, Justice, Commerce, and Related Agencies Appropriations Act, 2006

National Science Foundation Funding

Life Sciences Research Funding

Innovation (Investment)

R&D Funding

0000381023

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

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

16. Specific lobbying issues

Negotiation and Ratification of Bilateral Income Tax Treaties

U.S.-Canada Tax Treaty

Revision of Tax Provisions in U.S. Model Treaty

Taiwan-U.S. Trade Agreement

Revision of Internal Revenue Code Subpart F on Deferral of Taxation

H.R. 1762/S. 750 CFC Look-Through for Related Party Payments

H.R. 1417/S. 1159 Active Financing Exemption Under Section F

H.R. 1736/S. 627 Investment in America Act of 2005

(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 Treasury

Internal Revenue Service

Department of Commerce

Department of State

Securities and Exchange Commission

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patricia J. Edington	
Linda C. Evans	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Timothy J. Sheehy	

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

Check if None

Signature _____ Date _____

0000381024

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

16. Specific lobbying issues

Treasury "Check-in-the-Box" Regulations
Taxation of Software (Section 18) Regulations
Taxation of Internet Transactions and Software
Fundamental Tax Reform - Tax Reform Advisory Panel
Internet Taxation and Business Activity Tax (BAT)
European Union Proposal for Taxation of Electronic Commerce, VAT Directive
European Union VAT on Outsourced Financial Services
Active Financing Exception to Subpart F
Research and Development Tax Credit Regulations
Research and Development Tax Credit Refinement - Alternative Simplified Credit
Securities and Exchange Commission Implementation of P.L. 107-204 Sarbanes-Oxley Act of 2002
Permanent Establishment (PE) Rules for Services in OECD
IRS Notice 2005-14 on S. 199 Domestic Production Credit
European Union Prospectus Directive
Committee of European Securities Regulators (CESR) Report on GAAP Equivalence
Treatment of Cross-Licensing Agreements under IRC (tax code)

1000381025

Registrant Name IBM

Client Name Self

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

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

16. Specific lobbying issues

International Telecommunications

Regulatory Treatment of Internet Service Providers

International Charging Arrangements for Internet Services

Electronic Commerce Trade Policy

E-Rate

Spectrum Allocation/Spectrum Management

Digital Television Transition

Voice Over Internet Protocol (VoIP)

E-911 Service

Municipal Broadband

Video Franchise

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

House of Representatives

Senate

Executive Office of the President

Office of the United States Trade Representative

Office of Science and Technology Policy

Department of Commerce

Technology Administration

National Telecommunications and Information Administration

Department of State

International Communications and Information Policy

Check if None

Federal Communications Commission

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patricia J. Edington	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Timothy J. Sheehy	
Cheryl Bruner	
Steven W. Stewart	

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

Check if None

Signature _____

Date _____

1000381028

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

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

16. Specific lobbying issues

Customs Classification

Emerging Markets

Electronic Commerce Trade Policy

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

WTO Negotiations Objectives Regarding E-Commerce

WTO Trade Classification

(See Attached Continuation Sheet)

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

Check if None

House of Representatives

Office of the Vice President

Senate

Executive Office of the President

Office of the United States Trade Representative

National Economic Council

Council of Economic Advisors

National Security Council

Office of Science & Technology

(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	
David N. Barnes	
Patricia J. Edington	
Edward A. Gillespie	
Debra L. Marks	
Kimberly A. Marsho	
Vera A. Murray	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Steven W. Stewart	
Susan C. Tuttle	
Marcus P. Williams	

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

Check if None

Signature _____ Date _____

1000381027

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

16. Specific Lobbying Issues

Asia Pacific Economic Cooperation

Ministerial and Heads of State Meetings

Free Trade Area of the Americas

Agenda and Issue Development

GATT Government Procurement Agreement

Membership Expansion

Adherence to the GATT Government Procurement Agreement

Trade Agreements Act

WTO Transparency Agreement

North America Free Trade Agreement (NAFTA)

Implementation and Preservation

U.S.-ANDEAN Free Trade Agreement

U.S.-Bahrain Free Trade Agreement

U.S.-Dominican Republic Central America Free Trade Agreement (DR-CAFTA)

U.S.-New Zealand Free Trade Agreement

U.S.-South Africa Customs Union Free Trade Agreement

U.S.-Thailand Free Trade Agreement

Export Controls Regulations

Deemed Export Regulations

Microprocessor and Computer Export Regulations

Semiconductor Export Regulations

New Computer Metric to Replace MTOPS

WTO Information Technology Agreement

WTO-Doha Development Agenda

WTO Tech Barriers to Trade (TBT) Agreement

WTO Non-Agriculture Market Access

WTO Trade Facilitation

WTO GATS Negotiations

Trade Treatment of Electronically Delivered Software

OECD Guidelines for Multinational Enterprises

China's WTO Accession Implementation

China Government Procurement

China WTO Government Procurement Agreement (GPA) Accession

China Standards-Related Issues, e.g., WAPI

Schumer Legislation on China Currency Manipulation

S 1048, S. 295, S. Amendment 309 to S. 600

0000381028



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

16. Specific Lobbying Issues (Cont'd)

WTO Accession - Russia

WTO Accession - Saudi Arabia

Foreign Investment - CFIUS Review of PC Business sale to Lenovo

Open Standards/Open Source

Iraq Reconstruction

1000381029

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

Department of Commerce

- Office of Deputy Secretary
- Bureau of Industry and Security
- International Trade Administration
- Technology Administration

Department of Defense

- Acquisition, Technology, and Logistics
- Command, Control, Communications, and Intelligence
- Policy
- National Security Agency

Department of Justice

Department of Homeland Security

- Bureau of Customs and Border Protection

Department of State

- Bureau of Economic and Business Affairs
- Bureau of Political-Military Affairs
- Bureau of Nonproliferation

Department of the Treasury

- International Affairs

U.S. Agency for International Development

Export-Import Bank of the United States

0000381030



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 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 “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 the lobbying 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-US 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 Holdings B.V. | 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 (Switzerland) |
| IBM Deutschland GmbH | IBM Taiwan Holdings B.V. |
| IBM Hellas Information Handling Systems S.A. (Greece) | IBM Thailand Co. Ltd. |
| International Business Machines Corporation | IBM (International Business Machines) Turk Limited |
| Magyarorszagi Kft (Hungary) | IBM United Kingdom Holdings Limited |
| IBM Ireland Limited | IBM del Uruguay, S.A. |
| IBM Israel Limited | IBM de Venezuela, S.A. |
| IBM India Limited | |
| IBM Italia S.P.A. | |
| IBM Japan, Ltd. | |

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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

Geri J. Colombaro
Yolanda L. Comedy
Timothy B. Hackman

ISSUE UPDATE

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

AVI

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 in c

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

Signature *William H. Glone*

Date 8/10/05

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