

Clerk of the House of Representatives
 Legislative Resource Center
 B-106 Cannon Building
 Washington, DC 20515

Secretary of the Senate
 Office of Public Records
 232 Hart Building
 Washington, DC 20510

LOBBYING REPO

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

1. Registrant Name <input checked="" type="checkbox"/> Organization <input type="checkbox"/> Individual		INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	
2. Address <input type="checkbox"/> Check if different than previously reported			
Address1	1301 K STREET, NW	Address2	
City	WASHINGTON	State	DC
Zip Code	20005		
3. Principal place of business (if different than line 2)			
City	Armonk	State	NY
Zip Code	10504		
4a. Contact Name	b. Telephone Number	c. E-mail	5. Sent
Mrs. LISA PALLUCONI	(202) 515-4381	pallucon@us.ibm.com	1987
7. Client Name <input checked="" type="checkbox"/> Self	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)		6. Hou
			3112

TYPE OF REPORT 8. Year 2007 Midyear (January1-June30) Year End (July 1-Dec)

9. Check if this filing amends a previously filed version of this report

10. Check if this is a Termination Report Termination Date _____ 11. No Lobbying Activity

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13	
<p>12. Lobbying</p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p><u>Less than \$10,000</u></p> <p><u>\$10,000 or more</u> \$ _____</p> <p>Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).</p>	<p>13. Organizations</p> <p>EXPENSE relating to lobbying activities for this reporting period were:</p> <p><u>Less than \$10,000</u></p> <p><u>\$10,000 or more</u> <input checked="" type="checkbox"/> \$ <u>3,860,000.00</u></p> <p>14. REPORTING Check box to indicate accounting method. See instructions for description</p> <p><input checked="" type="checkbox"/> Method A. Reporting amounts using LDA definition</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6033(c) Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 162(e) Revenue Code</p>

Signature Digitally Signed By: Christopher G Caine Date 08/1
 US, DST ACES Business Representative, ACES TrustID Business Certificate, Christopher G Caine

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[0.05]

12 2007 16:54 FR IBM WASHINGTON 202 515 5078 TO 92241851 P.02/30

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

15. General issue area code **ENG** Energy/Nuclear (one per page)

16. Specific lobbying issues

Smart Power Grid
H.R. 6 Clean Energy Act of 2007
H.R. 2641/S. 1751 Energy and Water Development and Related Agencies Appropriations Act, 2008
Roadrunner Project

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

Department of Energy
Office of Science & Technology Policy
Federal Energy Regulatory Commission (FERC)
Environmental Protection Agency (EPA)

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

First	Name		Covered Official Position (if applicable)
	Last	Suffix	
Christopher	Caine		
Marija	Zivanovic-Smith		
Adrienne	Rhone		
Dana	Gray		
George	Southworth		
Lauren	Phelps		
Meredith	Singer		
Ned	McCulloch		
Mark	O'Riley		

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

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P.03/30

202 515 5078 TO 92241851

12 2007 16:55 FR IBM WASHINGTON

ADDENDUM for General Lobbying Issue Area: ENG - Energy/Nuclear

H.R. 2776 Renewable Energy and Energy Conservation Tax Act of 2007

H.R. 3221 New Direction for Energy Independence, National Security and Consumer Protection Act

S. 1419 Renewable Fuels, Consumer Protection, and Energy Efficiency Act of 2007

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P.04/30

202 515 5078 TO 92241851

12 2007 16:55 FR IBM WASHINGTON

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** Budget/Appropriations (one per page)

16. Specific lobbying issues

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

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

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

Department of Defense	General Services Administration	CDC	Dept. of Educa
Executive Office of the President	Domestic Policy Council	DHS	Office of Scie
Office of Mangement and Budget	Department of HHS	Dept. of Energy	
Office of Federal Procurement Policy	FDA	Dept. of Commerce	

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Adrienne	Rhone		
Christine	Dodd		
Chris	Mustain		
Susan	Tuttle		
Ed	Gillespie		
Bill	Warner		
Meredith	Singer		
David	Barnes		

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

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P. 05/30

202 SLS 5078 TO 92241851

12 2027 16-55 FR 101 WASHINGTON

P.06/30

202 S15 5078 TO 92241851

12 2007 16:55 FR IBM WASHINGTON

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

15. General issue area code **CPT** Copyright/Patent/Trademark (one per page)

16. Specific lobbying issues

Patent Reform
 S. 1145/H.R. 1908 Patent Reform Act of 2007
 Post-Patent-Grant Review

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

United States Trade Representative
 Department of Commerce
 Patent and Trademark Office
 Department of Defense, Department of State
 Department of Justice
 Federal Trade Commission

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

First	Name		Covered Official Position (if applicable)
	Last	Suffix	
Christopher	Caine		
Marc	Williams		
Tim	Sheehy		
Ned	McCulloch		
Meredith	Singer		
Dana	Gray		
George	Southworth		
Lauren	Phelps		

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

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202 515 5078 TO 92241851

12 2007 16:55 FR IBM WASHINGTON

ADDENDUM for General Lobbying Issue Area: |CPT - Copyright/Patent/Trademark

- Venue
- Damages Apportionment
- Enhanced Damages
- Fee Shifting
- Third Party Submission of Prior Art with Commentary
- Patent Claim Clarity
- Patent Quality
- Prior User Rights
- H.R. 3093/S. 1745 Commerce, Justice, Science and Related Agencies Appropriations Act, 2008
 - Patent and Trademark Office Funding
- Community Patent Review
- University Technology Transfer
- Broadcast Flag
- Open Source Software
- Open Standards and Interoperability
- "Ex Ante" Disclosure of IP in standard-setting
- Interoperability and Competition Policy

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202 515 5078 TO 92241851

12 2007 16:56 FR IBM WASHINGTON

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

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

16. Specific lobbying issues

H.R. 3222 Department of Defense Appropriations Act, FY 2007
 H.R. 1585/S. 1547 National Defense Authorization Act, FY 2007
 Enterprise Resource Planning (Navy)
 eArmy University

17. House(s) of Congress and Federal agencies : Check if None House Senate
 Department of Defense

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Ed	Gillespie		
Bill	Warner		
Ned	McCulloch		
Meredith	Singer		
Dana	Gray		
George	Southworth		
Lauren	Phelps		

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

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12 2007 16:56 FR IBM WASHINGTON 202 SIS 5078 TO 92241851 P.09/30

ADDENDUM for General Lobbying Issue Area: DEF - Defense

- Business Management Modernization**
- Transformation Satellite Program**
- DD(X) Destroyer Program**
- Army Distributed Learning System**
- Army Future Combat System**
- Defense Transportation Coordination Initiative**
- Air Force Personnel Services Delivery Transformation**

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202 S15 5078 TO 92241851

12 2007 16:56 FR IBM WASHINGTON

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

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

16. Specific lobbying issues

Educational Standards
 Workforce Development
 Innovation (Talent)
 Accessibility

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

Department of Labor
 Department of Commerce
 Department of Education
 National Science Foundation

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Susan	Tuttle		
Meredith	Singer		
Ned	McCulloch		
George	Southworth		
Dana	Gray		
Lauren	Phelps		
PJ	Edington		
Chris	Mustain		

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

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12 2007 16:56 FR IBM WASHINGTON 202 SIS 5078 TO 92241851 P.11/30

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

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

16. Specific lobbying issues
 Product Take-Back Legislation
 Draft "Energy Star Program"

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

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

First	Name		Covered Official Position (if applicable)
	Last	Suffix	
Christopher	Caine		
Ed	Perry		
Ned	McCulloch		
Mercedith	Singer		
Dana	Gray		
George	Southworth		
Lauren	Phelps		

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

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12 2007 16:56 FR IBM WASHINGTON

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

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

16. Specific lobbying issues

H.R. 1585/S. 1547 National Defense Authorization Act, 2007
Competitive Sourcing Provisions

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

Executive Office of the President
Office of Management and Budget
Office of Federal Procurement Policy
General Services Administration

Department of Defense
Office of Procurement Policy

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Bill	Warner		
Ned	McCulloch		
Meredith	Singer		
Dana	Gray		
George	Southworth		
Lauren	Phelps		

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

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ADDENDUM for General Lobbying Issue Area: GOV - Government Issues

Use of Government-Wide Acquisition Vehicles

Use of Specialty Metals/Domestic Source Requirements

Use of Time & Material Contracts

Bid Protest of Task & Delivery Orders

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12 2007 16:57 FR IBM WASHINGTON

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

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

16. Specific lobbying issues

H.R. 3176 Statc & Children Health Insurance Program - 2007 reauthorization (SCHIP)
 S. 1456 Electronic Personal Health Records (PHRS) for Member of the Federal Employee Health Benefit Plans
 H.R. 493/S. 358 Genetic Information Nondiscrimination Act of 2007
 S. 558 Mental Health Parity Act of 2007

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

Executive Office of the President Department of Health and Human Services Human Resource and Serv
 Department of Defense Centers for Disease Control and Prevention Food and Drug Administra
 Domestic Policy Council National Institutes of Health

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

First	Name		Covered Official Position (if applicable)
	Last	Suffix	
Christopher	Cainc		
Ned	McCulloch		
David	Barnes		
Meredith	Singer		
Dana	Gray		
Christine	Dodd		
George	Southworth		
Lauren	Phelps		

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

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ADDENDUM for General Lobbying Issue Area: HCR - Health Issues

S. 1418 Wired for Healthcare Quality Act

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12 2007 16:57 FR IBM WASHINGTON

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 **HOM** **Homeland Security** (one per page)

16. Specific lobbying issues

Supply Chain Security and Air Cargo Security
H.R. 1/S. 4 Implementing Provisions of the 9/11 Commission Act

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

Department of Homeland Security
Bureau of Customs and Border Protection
Transportation Security Agency

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

First	Name		Covered Official Position (if applicable)
	Last	Suffix	
Christopher	Caine		
Kim	Marsho		
Steve	Stewart		
Ned	McCulloch		
Meredith	Singer		
Dana	Gray		
Geroge	Southworth		
Lauren	Phelps		

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

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202 515 5078 TO 92241851

12 2007 16:57 FR IBM WASHINGTON

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 **MMM Medicare/Medicaid** (one per page)

16. Specific lobbying issues

H.R. 3176 SCHIP Reauthorization and Reform Act of 2007
 H.R. 3162 Children's Health and Medicare Protection (CHAMP) Act of 2007

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

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Ned	McCulloch		
David	Barnes		
Meredith	Singer		
Dana	Gray		
George	Southworth		
Lauren	Phelps		
Christine	Dodd		

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

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202 SLS 5078 TO 92241851

12 2007 16-57 FR 1BY WASHINGTON

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** Retirement (one per page)

16. Specific lobbying issues

S. 708 Health Care and Training for Older Workers Act
Deferred Compensation Provisions (proposed) to be used to raise revenue for other legislation (pending)

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

Department of Labor

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

First	Name		Covered Official Position (if applicable)
	Last	Suffix	
Christopher	Caine		
Ned	McCulloch		
David	Barnes		
Dana	Gray		
Meredith	Singer		
Christine	Dodd		
Georgc	Southworth		
Lauren	Phelps		

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

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202 515 5078 TO 92241851

12 2007 16:58 FR IBM WASHINGTON

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

15. General issue area code SCI Science/Technology (one per page)

16. Specific lobbying issues

- H.R. 362 10,000 Teachers, 10 Million Minds Science and Math Scholarship Act
- H.R. 363 Sowing the Seeds Through Science and Engineering Research Act
- H.R. 1867 National Science Foundation Authorization Act of 2007
- H.R. 1868 Technology Innovation and Manufacturing Stimulation Act of 2007

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

National Science Foundation
 Department of Commerce
 Department of Education

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Chris	Mustain		
Susan	Tuttle		
Ned	McCulloch		
Meredith	Singer		
George	Southworth		
Dana	Gray		
Lauren	Phelps		
PJ	Edington		

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

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ADDENDUM for General Lobbying Issue Area: SCI - Science/Technology

H.R. 2272 21st Century Competitiveness Act of 2007

H.R. 2641/S. 1751 Energy and Water Development and Related Agencies Appropriations Act, 2008 (DOE Office of Science Appropriations)

Department of Energy funding - Office of Science

H.R. 3093/S. 1745 Commerce, Justice, Science, and Related Agencies Appropriations Act, 2008 (NSF & NIST Appropriations)

S. 761 America COMPETES Act

National Science Foundation Funding

National Institute on Standards and Technology Funding

Innovation

Service Science

R&D Funding

China Innovation Policy

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12 2007 16:58 FR IBM WASHINGTON 202 515 5078 TO 92241851 P.21/30

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** Taxation/Internal Revenue Code (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. Tax Agreement

17. House(s) of Congress and Federal agencies Check if None House Senate
 Executive Office of the President Department of Commerce
 National Economic Advisory Council Department of State
 Department of Treasury United States Trade Representative
 Internal Revenue Service

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Linda	Evans		
Ed	Perry		
Ned	McCulloch		
Meredith	Singer		
Dana	Gray		
George	Southworth		
Lauren	Phelps		

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

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12 2007 16:58 FR IBM WASHINGTON 202 515 5078 TO 92241851 P.22/30

ADDENDUM for General Lobbying Issue Area: TAX - Taxation/Internal Revenue Code

U.S.-Brazil Tax Treaty
U.S.-Germany Tax Treaty
U.S.-Sweden Tax Treaty
U.S.-Korea Tax Treaty
U.S.-Italy Tax Treaty
U.S.-Spain Tax Treaty
Revision of Internal Revenue Code Subpart F on Deferral of Taxation
Section 954 (c) 6 CFC Look-Through for Related Party Payments
Section 954 (h) Active Financing Under Section F
H.R. 2138/S. 41 R&D Tax Credit
Treasury "Check-the-Box" Regulations
Taxation of Software (Section 18) Regulations
Taxation of Internet Transactions and Software
Fundamental Tax Reform - Tax Reform Advisory Panel and Various Congressional Hearings
Internet Taxation and Business Activity Tax (BAT)
European Union VAT on Outsourced Financial Services
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 Profit Attribution and Business Restructuring in OECD
Section 199 Domestic Production Deduction Regulation
Treatment of Cross-Licensing Agreements under IRC (tax code)
Treasury Regulations on Contract Manufacturing
Revenue Ruling 97-48, Revenue Ruling 75-7, and Related Code System
Treasury Sections 1.954-3
Field Service Advisory (FSA)
Economic Substance Doctrine Codification
H.R. 4297 Tax Increase Prevention and Reconciliation Act of 2005
Substantial Assistance rule under Treasury Reg. S.1.954
"Contract Manufacturing" rule under Treasury Reg. S.1.954
Extension of Tax Relief Act of 2006
H.R. 1591 Minimum Wage

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12 2007 16:58 FR IBM WASHINGTON

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** Telecommunications (one per page)

16. Specific lobbying issues

International Telecommunications Special Access Rate Reform
 Regulatory Treatment of Internet Service Providers
 Spectrum Allocation/Spectrum Management
 Telecommunications Reform

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

Federal Communications Commission

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

First	Name		Covered Official Position (if applicable)
	Last	Suffix	
Christopher	Caine		
Cheryl	Bruner		
Steve	Stewart		
Ned	McCulloch		
Meredith	Singer		
Dana	Gray		
George	Southworth		
Lauren	Phelps		

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

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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** : Trade (Domestic/Foreign) (one per page)

16. Specific lobbying issues

- Customs Classification
- Emerging Markets
- Asia Pacific Economic Cooperation
- Ministerial and Heads of State Meetings

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

- Executive Office of the President
- Office of the U.S. Trade Rep.
- National Economic Council
- Council of Economic Advisors
- National Security Council
- Office of Deputy Secy.
- Office of the Vice Pres.
- Dept. of Commerce
- Dept. of Treasury
- U.S. Customs & Border Protection
- Dept. of State
- Dept. of Homeland Security

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Lauren	Phelps		
Ned	McCulloch		
Meredith	SingerMarks		
Dana	Gray		
Gcorge	Southworth		
Ed	Gillespie		
Kim	Marsho		
Steve	Stewart		

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

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ADDENDUM for General Lobbying Issue Area: TRD - Trade (Domestic/Foreign)

Electronic Commerce Trade Policy

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

WTO Government Procurement Agreement

- Membership Expansion
- Adherence to the WTO Government Procurement Agreement
- Trade Agreements Act

U.S.-Peru Free Trade Agreement

U.S.-Colombia Free Trade Agreement

U.S.-Korea Free Trade Agreement

U.S.-Malaysia Free Trade Agreement

U.S.-Panama Free Trade Agreement

U.S.-Thailand Free Trade Agreement

Export Controls Regulations

Deemed Export Regulations

- Export Controls for the PRC

Microprocessor and Computer Export Regulations - Radiation Hardness

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

Trade Treatment of Remanufactured Goods

Trade Facilitation

China's WTO Accession Implementation

China Government Procurement

China WTO Government Procurement Agreement (GPA) Accession

China Services-Related Issues

Baucus-Grassley S. 1607 The Currency Exchange Rate Oversight and Reform Act of 2007

China

- Strategic Economic Dialogue

Joint Commission on Commerce & Trade (JCCT)

Joint Economic Commission (JEC)

Open Standards/Open Source

Global Sourcing

India Government Procurement

Proposed rulemaking concerning revisions and clarifications of export and re-export controls for China and new authorized end user.

S. 1612 International Emergency Economic Powers Act

Trade Promotion Authority (TPA)

Services Caucus

Dodd-Shelby S. 1677 The Currency Reform & Financial Markets Access Act of 2007

Davis-English H.R. 1229 Non-Market Economy Trade Remedy Act of 2007

Baucus-Snow S. 122 Trade Adjustment Assistance Improvement Act of 2007

Stabenow-Bunning S. 796 Fair Currency Act of 2007

Ryan-Hunter H.R. 2942 Currency Reform for Fair Trade Act of 2007

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12 2007 16:59 FR IBM WASHINGTON

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 Computer Industry (one per page)

16. Specific lobbying issues

- S. 495 Personal Data Privacy & Security Act of 2007
- S. 239 Notification of Risk to Personal Data Act of 2007
- S. 1178 Identity Theft Prevention Act
- S. 1260 Data Security Act of 2007

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

Department of Commerce
Federal Trade Commission

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Ned	McCulloch		
Dana	Gray		
George	Southworth		
Lauren	Phelps		
Meredith	Singer		
Tim	Sheehy		
Katie	Ignawszewski		

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

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12 2007 16:59 FR IBM WASHINGTON 202 515 5078 TO 92241851 P. 28/30

ADDENDUM for General Lobbying Issue Area: CPI - Computer Industry

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

P. 29/30

202 515 5078 TO 92241851

12 2007 17:00 FR IBM WASHINGTON

Registrant INTERNATIONAL BUSINESS MACHINES CORPORATION Client Name INTERNATIONAL BUSINESS MACHINES CORPORATION

Information Update Page - Complete ONLY where registration information has changed.

20. Client new address

Address _____

City _____ State _____ Zip Code _____ - _____ Co

21. Client new principal place of business (if different than line 20)

City _____ State _____ Zip Code _____ - _____ Co

22. New General description of client's business or activities

LOBBYIST UPDATE

23. Name of each previously reported individual who is no longer expect to act as a lobbyist for the client

First Name	Last Name	Suffix	
1. Marija	Zivanovic-Smith		3
2.			4

ISSUE UPDATE

24. General lobbying issue that no longer pertain

AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Name	Address			Principal Place of B (city and state or co
	Street Address City	State/Province Zip	Country	
				City State City State

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

1.	2.	3.
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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
	Street Address City	State/Province	Country		
				City State	Country

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

3.	5.
4.	6.

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