

LOBBYING REPORT

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

1. Registrant Name:

INTL BUSINESS MACHINES CORP

2. Address:

1301 K STREET, NW, WASHINGTON, DC 20005-3307

3. Principal place of business (if different from line 2):

City: Armonk State/Zip(or Country): NY 10504

4. Contact Name: LISA PALLUCONI

Telephone: 2025154381

E-mail (optional): pallucon@us.ibm.com

Senate ID #: 19877-12

House ID #:

7. Client Name: Self

TYPE OF REPORT

8. Year 2007 Midyear (January 1 - June 30): **OR** Year End (July 1 - December 31):

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

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

INCOME OR EXPENSES

Complete Either Line 12 **OR** Line 13

12. Lobbying Firms

INCOME relating to lobbying activities for this reporting period was:

Less than \$10,000:

\$10,000 or more: => Income (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).

13. Organizations

EXPENSES relating to lobbying activities for this reporting period were:

Less than \$10,000:

\$10,000 or more: => Expenses (nearest \$20,000): 3,940,000.00

14. Reporting Method.

Check box to indicate expense accounting method. See instructions for description of options.

- Method A.** Reporting amounts using LDA definitions only
 Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code
 Method C. Reporting amounts under section 162(e) of the Internal Revenue Code

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

15. General issue area code: AGR (one per page)

16. Specific lobbying issues:

H.R. 2419 Farm, Nutrition, and Bioenergy Act of 2007 Food Stamp Program

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

Agriculture, Dept of (USDA)
HOUSE OF REPRESENTATIVES
SENATE

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: RHONE, ADRIENNE G.

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

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

LOBBYING ACTIVITY

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

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

16. Specific lobbying issues:

IBM has lobbied for various Governmental Programs including Amtrack, Customs Modernization Program, Food Stamp Program, IT Projects, and Government/Private Sector Research and Development Programs. Please see Lobbying Area Codes: AGR, CPT, DEF, GOV, HCR, HOM, & SCI for the report on these issues.

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

Agriculture, Dept of (USDA)
Centers For Disease Control & Prevention (CDC)
Commerce, Dept of (DOC)
Defense, Dept of (DDO)
Education, Dept of
Executive Office of the President (EOP)
Food & Drug Administration (FDA)
General Services Administration (GSA)
HOUSE OF REPRESENTATIVES
Health & Human Services, Dept of (HHS)
Homeland Security, Dept of (DHS)
Natl Science Foundation (NSF)
Office of Management & Budget (OMB)
Office of Science & Technology Policy (OSTP)
SENATE

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

Name: BARNES, DAVID N
Covered Official Position (if applicable): N/A
Name: CAINE, CHRISTOPHER G.
Covered Official Position (if applicable): N/A
Name: DOOD, CHRISTINE
Covered Official Position (if applicable): N/A
Name: EDINGTON, PATRICIA J.
Covered Official Position (if applicable): N/A
Name: GRAY, DANA
Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER
Name: MARSHO, KIMBERLY M.
Covered Official Position (if applicable): N/A
Name: MCCULLOCH, EDGAR H. III
Covered Official Position (if applicable): N/A
Name: MUSTAIN, CHRISTOPHER J.
Covered Official Position (if applicable): N/A
Name: ORILEY, MARK
Covered Official Position (if applicable): N/A
Name: PHELPS, LAUREN
Covered Official Position (if applicable): N/A
Name: RHONE, ADRIENNE G.
Covered Official Position (if applicable): N/A
Name: SINGER, MEREDITH
Covered Official Position (if applicable): N/A
Name: SOUTHWORTH, GEORGE
Covered Official Position (if applicable): N/A
Name: STEWART, STEVEN W.
Covered Official Position (if applicable): N/A
Name: TUTTLE, SUSAN C.
Covered Official Position (if applicable): N/A
Name: WILLIAMS, MARCUS P.
Covered Official Position (if applicable): N/A

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

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

16. Specific lobbying issues:

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 contacted:

Commerce, Dept of (DOC)
Federal Trade Commission (FTC)
HOUSE OF REPRESENTATIVES
SENATE

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: IGNASZEWSKI, KATIE

Covered Official Position (if applicable): N/A

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SHEEHY, TIMOTHY J.

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

15. General issue area code: CPT (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 contacted:

Commerce, Dept of (DOC)
Council of Economic Advisers (CEA)
Defense, Dept of (DDO)
Executive Office of the President (EOP)
Federal Trade Commission (FTC)
HOUSE OF REPRESENTATIVES
Justice, Dept of (DOJ)
Nat'l Economic Council (NEC)
Office of Science & Technology Policy (OSTP)
Patent & Trademark Office (PTO)
SENATE
State, Dept of (DOS)
U.S. Trade Representative (USTR)

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: RHONE, ADRIENNE G.

Covered Official Position (if applicable): N/A

Name: SHEEHY, TIMOTHY J.

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

Name: WILLIAMS, MARCUS P.

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

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

16. Specific lobbying issues:

H.R. 3222 Making appropriations for the Department of Defense for the fiscal year ending September 30, 2008, and for other purposes.
H.R. 1585/S. 1547 National Defense Authorization Act, FY 2007 Enterprise Resource Planning (Navy)

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

Defense, Dept of (DOD)
HOUSE OF REPRESENTATIVES
SENATE

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: RHONE, ADRIENNE G.

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

Name: WILLIAMS, MARCUS P.

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

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

16. Specific lobbying issues:

Educational Standards Accessibility Workforce Development Innovation (Talent) Science, Technology,
Engineering, Mathematics (STEM) Programs

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

Commerce, Dept of (DOC)
Education, Dept of
HOUSE OF REPRESENTATIVES
Labor, Dept of (DOL)
Nat'l Science Foundation (NSF)
SENATE

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

Name: CAINE, CHRISTOPHER G.
Covered Official Position (if applicable): N/A
Name: EDINGTON, PATRICIA J.
Covered Official Position (if applicable): N/A
Name: GRAY, DANA
Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER
Name: MCCULLOCH, EDGAR H. III
Covered Official Position (if applicable): N/A
Name: MUSTAIN, CHRISTOPHER J.
Covered Official Position (if applicable): N/A
Name: PHELPS, LAUREN
Covered Official Position (if applicable): N/A
Name: SINGER, MEREDITH
Covered Official Position (if applicable): N/A
Name: SOUTHWORTH, GEORGE
Covered Official Position (if applicable): N/A
Name: TUTTLE, SUSAN C.
Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

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

16. Specific lobbying issues:

Smart Power Grid H.R. 6 Energy Independence & Security 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 contacted:

Energy, Dept of
Environmental Protection Agency (EPA)
Federal Energy Regulatory Commission (FERC)
HOUSE OF REPRESENTATIVES
Office of Science & Technology Policy (OSTP)
SENATE

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: RILEY, MARK

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: RHONE, ADRIENNE G.

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY.

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

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

16. Specific lobbying issues:

Product Take-Back Legislation Draft "Energy Star Program"

17. House(s) of Congress and Federal agencies contacted:
Environmental Protection Agency (EPA)

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PERRY, EDUMND F.

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

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

16. Specific lobbying issues:

H.R. 1585/S. 1547 National Defense Authorization Act, 2007 Competitive Sourcing Provisions S. 680 Accountability in Government Contracting Act of 2007

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

Defense, Dept of (DOD)
Executive Office of the President (EOP)
General Services Administration (GSA)
HOUSE OF REPRESENTATIVES
Office of Management & Budget (OMB)
SENATE

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

Name: WILLIAMS, MARCUS P.

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

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

16. Specific lobbying issues:

H.R. 3176 State & 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 contacted:

Centers For Disease Control & Prevention (CDC)
Centers For Medicare and Medicaid Services (CMS)
Defense, Dept of (DOD)
Executive Office of the President (EOP)
Food & Drug Administration (FDA)
HOUSE OF REPRESENTATIVES
Health & Human Services, Dept of (HHS)
Health Resources & Services Administration (HRSA)
Natl Institutes of Health (NIH)
SENATE
White House Office

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

Name: BARNES, DAVID N
Covered Official Position (if applicable): N/A
Name: CAINE, CHRISTOPHER G.
Covered Official Position (if applicable): N/A
Name: DOOD, CHRISTINE
Covered Official Position (if applicable): N/A
Name: GRAY, DANA
Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER
Name: MCCULLOCH, EDGAR H. III
Covered Official Position (if applicable): N/A
Name: PHELPS, LAUREN
Covered Official Position (if applicable): N/A
Name: SINGER, MEREDITH
Covered Official Position (if applicable): N/A
Name: SOUTHWORTH, GEORGE
Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

15. General issue area code: HOM (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 contacted:

HOUSE OF REPRESENTATIVES
Homeland Security, Dept of (DHS)
SENATE
Transportation Security Administration (TSA)
U.S. Customs & Border Protection

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

Name: CAINE, CHRISTOPHER G.
Covered Official Position (if applicable): N/A
Name: GRAY, DANA
Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER
Name: MARSHO, KIMBERLY M.
Covered Official Position (if applicable): N/A
Name: MCCULLOCH, EDGAR H. III
Covered Official Position (if applicable): N/A
Name: PHELPS, LAUREN
Covered Official Position (if applicable): N/A
Name: SINGER, MEREDITH
Covered Official Position (if applicable): N/A
Name: SOUTHWORTH, GEORGE
Covered Official Position (if applicable): N/A
Name: STEWART, STEVEN W.
Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

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

16. Specific lobbying issues:

S. 1083, Securing Knowledge, Innovation, and Leadership Act of 2007 S. 1639 / HR 1645, to provide for comprehensive immigration reform and for other purposes Immigration Reform - Visas

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

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

Name: BARNES, DAVID N

Covered Official Position (if applicable): N/A

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: DOOD, CHRISTINE

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

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

16. Specific lobbying issues:

Competition / Antitrust H.R. 800 / S. 1041 Employee Free Choice Act of 2007 H.R. 3685 Employee Non-Discrimination Act of 2007

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

Federal Trade Commission (FTC)
HOUSE OF REPRESENTATIVES
Justice, Dept of (DOJ)
SENATE
State, Dept of (DOS)

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: DOOD, CHRISTINE

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SHEEHY, TIMOTHY J.

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

15. General issue area code: MMM (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 contacted: **None**

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

Name: BARNES, DAVID N

Covered Official Position (if applicable): N/A

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: DOOD, CHRISTINE

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

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

16. Specific lobbying issues:

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 contacted:

HOUSE OF REPRESENTATIVES

Labor, Dept of (DOL)

SENATE

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

Name: BARNES, DAVID N

Covered Official Position (if applicable): N/A

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: DOOD, CHRISTINE

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

15. General issue area code: SCI (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 contacted:

Commerce, Dept of (DOC)
Defense, Dept of (DOD)
Education, Dept of
Energy, Dept of
HOUSE OF REPRESENTATIVES
Homeland Security, Dept of (DHS)
Nat'l Institute of Standards & Technology (NIST)
Nat'l Science Foundation (NSF)
Office of Science & Technology Policy (OSTP)
SENATE

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

Name: CAINE, CHRISTOPHER G.
Covered Official Position (if applicable): N/A
Name: EDINGTON, PATRICIA J.
Covered Official Position (if applicable): N/A
Name: GRAY, DANA
Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER
Name: MCCULLOCH, EDGAR H. III
Covered Official Position (if applicable): N/A
Name: MUSTAIN, CHRISTOPHER J.
Covered Official Position (if applicable): N/A
Name: PHELPS, LAUREN
Covered Official Position (if applicable): N/A
Name: SINGER, MEREDITH
Covered Official Position (if applicable): N/A
Name: SOUTHWORTH, GEORGE
Covered Official Position (if applicable): N/A
Name: TUTTLE, SUSAN C.
Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

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

16. Specific lobbying issues:

Negotiation and Ratification of Bilateral Income Tax Treaties U.S.-Canada Tax Treaty Revision of Tax Provisions in U.S. Model Treaty

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

Commerce, Dept of (DOC)
Council of Economic Advisers (CEA)
Executive Office of the President (EOP)
HOUSE OF REPRESENTATIVES
Internal Revenue Service (IRS)
SENATE
State, Dept of (DOS)
Treasury, Dept of
U.S. Trade Representative (USTR)

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: EVANS, LINDA C.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PERRY, EDUMND F.

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

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

16. Specific lobbying issues:

Special Access Rate Reform Universal Service Fund Broadband Forbearance

17. House(s) of Congress and Federal agencies contacted:
Federal Communications Commission (FCC)

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

Name: BRUNER, CHERYL L.

Covered Official Position (if applicable): N/A

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

Name: STEWART, STEVEN W.

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

LOBBYING ACTIVITY

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

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

16. Specific lobbying issues:

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

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

Commerce, Dept of (DOC)
Executive Office of the President (EOP)
HOUSE OF REPRESENTATIVES
Homeland Security, Dept of (DHS)
Nat'l Economic Council (NEC)
Nat'l Security Council (NSC)
SENATE
State, Dept of (DOS)
Treasury, Dept of
U.S. Customs & Border Protection
U.S. Trade Representative (USTR)
Vice President of the U.S.

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

Name: BRUNER, CHERYL L.
Covered Official Position (if applicable): N/A
Name: CAINE, CHRISTOPHER G.
Covered Official Position (if applicable): N/A
Name: GILLESPIE, EDWARD A.
Covered Official Position (if applicable): N/A
Name: GRAY, DANA
Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER
Name: MARKS, DEBRA L.
Covered Official Position (if applicable): N/A
Name: MARSHO, KIMBERLY M.
Covered Official Position (if applicable): N/A
Name: MCCULLOCH, EDGAR H. III
Covered Official Position (if applicable): N/A
Name: PHELPS, LAUREN
Covered Official Position (if applicable): N/A
Name: SINGER, MEREDITH
Covered Official Position (if applicable): N/A
Name: SOUTHWORTH, GEORGE
Covered Official Position (if applicable): N/A
Name: STEWART, STEVEN W.
Covered Official Position (if applicable): N/A

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

Signature: ON FILE Date: Feb 13, 2008

Printed Name and Title: CHRISTOPHER G. CAINE, VP OF GO -

Information Update Page:

Complete ONLY where registration information has changed.

LOBBYIST UPDATE

23. Name of each previously reported individual who is NO LONGER expected to act as a lobbyist for the client

Name: MARSHO, KIMBERLY M.

ISSUE UPDATE

24. General lobbying issues previously reported that NO LONGER pertain

AFFILIATED ORGANIZATIONS

25. Add the following organization(s)

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

28. Name of each previously reported foreign entity the NO LONGER owns, OR controls, OR is affiliated with the registrant, client or affiliated organization

Signature: ON FILE Date: Feb 13, 2008

Printed Name and Title: -