

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P.O. BOX 7566

WASHINGTON, D.C. 20044-7566

(202) 662-6000

FACSIMILE: (202) 662-6291

SECRETARY OF THE SENATE

99 AUG 12 AM 2:15

H. D.

TELEPHONE 44-71-495-5020  
FACSIMILE 44-71-495-3101

KUNSTLAAN 44 AVENUE DES ARTS  
BRUSSELS 1040 BELGIUM  
TELEPHONE 32-2-519-5230  
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STUART C. STOCK

DIRECT DIAL NUMBER  
(202) 662-5394

DIRECT FACSIMILE NUMBER  
(202) 778-5394

sstock@cov.com

August 10, 1999

Secretary of the Senate  
Office of Public Records  
232 Hart Senate Office Building  
Washington, D.C. 20510

Dear Sir:

Enclosed please find for filing with your office an original and one copy of our firm's mid-year 1999 Lobbying Report with respect to our clients Bank of America Corporation, Bank One Corporation and Microsoft Corporation. We would appreciate your stamping the extra copy of each Lobbying Report and returning them to us in the enclosed self-addressed and stamped envelope.

Sincerely,



Stuart C. Stock

Enclosures

99 AUG 12 PM 2: 16

# LOBBYING REPORT

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

1. Registrant Name  
**Covington & Burling**

2. Address  Check if different than previously reported.  
**1201 Pennsylvania Avenue, N.W.**

3. Principal Place of Business (if different from line 2)  
City: **Washington** State/Zip (or Country) **D.C. 20004**

4. Contact Name <b>Stuart C. Stock</b>	Telephone <b>202-662-5384</b>	Email (optional)	5. Senate ID # <b>11195-672</b>
7. Client Name <input type="checkbox"/> Self <b>Microsoft Corporation</b>	6. House ID # <b>31827064</b>		

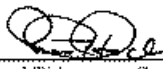
**TYPE OF REPORT** 8. Year 1999 Midyear (January 1-June 30)  OR Year End (July 1-December 31)

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	13. Organizations
<p><b>INCOME</b> relating to lobbying activities for this reporting period was:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input checked="" type="checkbox"/> ⇒ \$ <u>40,000</u> Income (nearest \$20,000)</p> <p>Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income for the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client.)</p>	<p><b>EXPENSES</b> relating to lobbying activities for this reporting period were:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> ⇒ \$ _____ Expenses (nearest \$20,000)</p> <p>14. <b>REPORTING METHOD.</b> Check box to indicate expense accounting method. See instructions for description of options.</p> <p><input type="checkbox"/> <b>Method A.</b> Reporting amounts using LIA definitions only</p> <p><input type="checkbox"/> <b>Method B.</b> Reporting amounts under section 6033(b)(8) of the Internal Revenue Code</p> <p><input type="checkbox"/> <b>Method C.</b> Reporting amounts under 162(e) of the Internal Revenue Code</p>

Signature  Date August 10, 1999  
 Printed Name and Title Stuart C. Stock, Partner

Registrant Name Covington & Burling

Client Name Microsoft Corporation

**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

**Electronic commerce matters relating to international electronic signature proposals.**

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

**Department of Commerce**

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

Name	Covered Official Position (if applicable)	New
Stuart C. Stock		<input checked="" type="checkbox"/>
E. Jason Albert		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

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

Signature  Date August 10, 1999  
Printed Name and Title Stuart C. Stock, Partner

Registrant Name Covington & Burling Client Name Microsoft Corporation

**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

**Electronic signature legislation, including H.R. 1714 and S. 761.**

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

**House of Representatives  
Senate  
Department of Commerce**

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

Name	Covered Official Position (if applicable)	New
<b>Stuart C. Stock</b>		<input checked="" type="checkbox"/>
<b>Erin M. Egan</b>		<input checked="" type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

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

Signature  Date August 10, 1999  
Printed Name and Title Stuart C. Stock, Partner

Registrant Name Covington & Burling

Client Name Microsoft Corporation

**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

- Protection of intellectual property through proposed federal action and implementation of Computer Software Piracy Executive Order.
- Protection of intellectual property in World Bank lending programs.

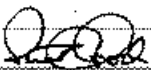
17. House(s) of Congress and Federal agencies contacted  Check if None

Department of Commerce

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

Name	Covered Official Position (if applicable)	New
Stuart C. Stock		<input type="checkbox"/>
Laurie C. Self		<input type="checkbox"/>
E. Jason Albert		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

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

16. Specific lobbying issues

**Competition issues affecting computer software industry.**

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)	New
<b>Charles F. Rule</b>		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

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

Signature  Date August 10, 1999  
Printed Name and Title Stuart C. Stock, Partner