

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 ST NW SUITE 1200, WASHINGTON, DC 20005-3307

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

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 2006 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): 3,700,000.00

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

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 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 contacted:

Centers For Disease Control & Prevention (CDC)
Commerce, Dept of (DOC)
Defense, Dept of (DOD)
Education, Dept of
Energy, 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)
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: DODD, CHRISTINE
Covered Official Position (if applicable): N/A
Name: EDINGTON, PATRICIA J.
Covered Official Position (if applicable): N/A
Name: GILLESPIE, EDWARD A.
Covered Official Position (if applicable): N/A
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: MUSTAIN, CHRISTOPHER J.
Covered Official Position (if applicable): N/A
Name: ORILEY, MARK
Covered Official Position (if applicable): N/A
Name: RAYMOND, BRIAN J.
Covered Official Position (if applicable): N/A
Name: RHONE, ADRIENNE G.
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
Name: ZIVANOVIC-SMITH, MARIJA
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: CPT (one per page)

16. Specific lobbying issues:

Patent Reform H.R. 2795 Patent Reform Act of 2005 H.R. 5096 Patents Depend on Quality Act of 2006 Post-Patent-Grant Review Venue Damages Apportionment Enhanced Damages Fee Shifting Third Party Submission of Prior Art with Commentary Patent Claim Clarity Patent Quality H.R. 5672 Science, Justice, Commerce, and Related Agencies Appropriations Act, 2007 H.R. 5631/H.J. Res 100/H.J. Res 102 Continuing Appropriations Resolution, FY 2007 Patent and Trademark Office Funding H.R. 5418/S. 3923 Legislation to establish a pilot program to enhance judicial patent expertise in certain U.S. district courts H.R. 2955 Intellectual Property Jurisdiction Clarification Act of 2005 Community Patent Review Analog Hole H.R. 4569 Digital Transition Content Security Act of 2005 S. 2686 Communications, Consumer's Choice, and Broadband Deployment Act of 2006 Broadcast Flag Open Source Software APEC Technology Choice Principles OECD Proposal on Innovation and Competition in the Software Sector Japan OECD Proposal on Software Open Standards and Interoperability S. 3818 Patent Reform Act of 2006 "Ex Ante" Disclosure of IP in standard-setting

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

Commerce, Dept of (DOC)

Defense, Dept of (DOD)

Federal Trade Commission (FTC)

HOUSE OF REPRESENTATIVES

Justice, Dept of (DOJ)

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: DODD, CHRISTINE

Covered Official Position (if applicable): SENATE "HELP" COMMITTEE

Name: MARKS, DEBRA L.

Covered Official Position (if applicable): N/A

Name: ORILEY, MARK

Covered Official Position (if applicable): N/A

Name: RAYMOND, BRIAN J.

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: TUTTLE, SUSAN C.

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: CSP (one per page)

16. Specific lobbying issues:

Privacy 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 H.R. 4127 Data Accountability and Trust Act (DATA) H.R. 3997 Financial Data Protection Act of 2005 S. 1789 Personal Data Privacy and Security Act of 2005 S. 1461 Consumer Identity Protection and Security Act Standards-Setting Bodies RFID

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

Commerce, Dept of (DOC)
Federal Trade Commission (FTC)
Food & Drug Administration (FDA)
HOUSE OF REPRESENTATIVES
Health & Human Services, Dept of (HHS)
Intl Trade Administration (ITA)
SENATE
Technology Administration

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: DOCKTOR, ROSLYN
Covered Official Position (if applicable): N/A
Name: DODD, CHRISTINE
Covered Official Position (if applicable): SENATE "HELP" COMMITTEE
Name: MARKS, DEBRA L.
Covered Official Position (if applicable): N/A
Name: ORILEY, MARK
Covered Official Position (if applicable): N/A
Name: RAYMOND, BRIAN J.
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: ZIVANDVIC-SMITH, MARIJA
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. 5631 Department of Defense Appropriations Act, FY 2007 H.R. 5122/S. 2766 National Defense Authorization Act, FY 2007
Enterprise Resource Planning (Navy) eArmy University Business Management Modernization Enterprise Combat Support System (Air Force) Transformation Satellite Program DD(X) Destroyer Program Army Distributed Learning System Army Future Combat System
Defense Transportation Coordination Initiative

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: DOOD, CHRISTINE

Covered Official Position (if applicable): SENATE "HELP" COMMITTEE

Name: GILLESPIE, EDWARD A.

Covered Official Position (if applicable): N/A

Name: MARKS, DEBRA L.

Covered Official Position (if applicable): N/A

Name: ORILEY, MARK

Covered Official Position (if applicable): N/A

Name: RAYMOND, BRIAN J.

Covered Official Position (if applicable): N/A

Name: RHONE, ADRIENNE G.

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
Innovation Act of 2005

Accessibility Workforce Development Innovation (Talent) S. 2109 National

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

Commerce, Dept of (DOC)

Education, Dept of

Executive Office of the President (EOP)

HOUSE OF REPRESENTATIVES

Labor, Dept of (DOL)

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: DODD, CHRISTINE

Covered Official Position (if applicable): SENATE "HELP" COMMITTEE

Name: EDINGTON, PATRICIA J.

Covered Official Position (if applicable): N/A

Name: MARKS, DEBRA L.

Covered Official Position (if applicable): N/A

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: ORILEY, MARK

Covered Official Position (if applicable): N/A

Name: RAYMOND, BRIAN J.

Covered Official Position (if applicable): N/A

Name: RHONE, ADRIENNE G.

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:

Electricity Smart Grid

17. House(s) of Congress and Federal agencies contacted:
Energy, Dept of
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: DODD, CHRISTINE
Covered Official Position (if applicable): SENATE "HELP" COMMITTEE
Name: MARKS, DEBRA L.
Covered Official Position (if applicable): N/A
Name: ORILEY, MARK
Covered Official Position (if applicable): N/A
Name: RAYMOND, BRIAN J.
Covered Official Position (if applicable): N/A
Name: RHONE, ADRIENNE G.
Covered Official Position (if applicable): N/A
Name: ZIVANOVIC-SMITH, MARIJA
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" Definition of Computer Specification

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: DODD, CHRISTINE

Covered Official Position (if applicable): SENATE "HELP" COMMITTEE

Name: MARKS, DEBRA L.

Covered Official Position (if applicable): N/A

Name: PERRY, EDUMND F.

Covered Official Position (if applicable): N/A

Name: RAYMOND, BRIAN J.

Covered Official Position (if applicable): N/A

Name: RHONE, ADRIENNE G.

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: F00 (one per page)

16. Specific lobbying issues:

Food Safety and Information Management

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

Agriculture, Dept of (USDA)

Food & Drug Administration (FDA)

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): SENATE "HELP" COMMITTEE

Name: MARKS, DEBRA L.

Covered Official Position (if applicable): N/A

Name: ORILEY, MARK

Covered Official Position (if applicable): N/A

Name: RAYMOND, BRIAN J.

Covered Official Position (if applicable): N/A

Name: RHONE, ADRIENNE G.

Covered Official Position (if applicable): N/A

Name: ZIVANDVIC-SMITH, MARIJA

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:

Use of GSA Support Centers Use of Government-Wide Acquisition Vehicles Use of Specialty Metals/Domestic Source Requirements H.R. 5576 Transportation/Treasury/HUD/District of Columbia/Independent Agencies Appropriations Act, FY 2007 Buy American Act exclusion for IT Products H.R. 5122/S. 2766 National Defense Authorization Act, 2007 Competitive Sourcing Provisions

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: DODD, CHRISTINE

Covered Official Position (if applicable): SENATE "HELP" COMMITTEE

Name: MARKS, DEBRA L.

Covered Official Position (if applicable): N/A

Name: ORILEY, MARK

Covered Official Position (if applicable): N/A

Name: RAYMOND, BRIAN J.

Covered Official Position (if applicable): N/A

Name: RHONE, ADRIENNE G.

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**

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:

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 H.R. 4157 Health Information Technology Promotion Act of 2006 Healthcare and RFID S. 2668 Reducing Fraudulent Imitation Drugs Act H.R. 4859 Federal Family Health Information Technology Act of 2006 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

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: DODD, CHRISTINE
Covered Official Position (if applicable): SENATE "HELP" COMMITTEE
Name: MARKS, DEBRA L.
Covered Official Position (if applicable): N/A
Name: MCCULLOCH, EDGAR H. III
Covered Official Position (if applicable): N/A
Name: ORILEY, MARK
Covered Official Position (if applicable): N/A
Name: RAYMOND, BRIAN J.
Covered Official Position (if applicable): N/A
Name: RHONE, ADRIENNE G.
Covered Official Position (if applicable): N/A
Name: ZIVANOVIC-SMITH, MARIJA
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. 5604 Safe Truckers Act H.R. 5441 Homeland Security Appropriations Act, 2007
H.R. 4439 TSA Reorganization H.R. 4954 Safe Port Act H.R. 5814 Department of Homeland Security Authorization Act, 2007 S.
2459 GreenLane Maritime Cargo Security Act Supply Chain Security

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

HOUSE OF REPRESENTATIVES
Homeland Security, Dept of (DHS)
SENATE
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: DOOD, CHRISTINE

Covered Official Position (if applicable): SENATE "HELP" COMMITTEE

Name: MARKS, DEBRA L.

Covered Official Position (if applicable): N/A

Name: MARSHO, KIMBERLY M.

Covered Official Position (if applicable): N/A

Name: ORILEY, MARK

Covered Official Position (if applicable): N/A

Name: RAYMOND, BRIAN J.

Covered Official Position (if applicable): N/A

Name: RHONE, ADRIENNE G.

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: MMM (one per page)

16. Specific lobbying issues:

Innovation (Infrastructure) Health Information Technology S. 2109 National Innovation Act of 2005

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

Agency for Health Care Policy & Research
Centers For Disease Control & Prevention (CDC)
Centers For Medicare and Medicaid Services (CMS)
Food & Drug Administration (FDA)
HOUSE OF REPRESENTATIVES
Health & Human Services, Dept of (HHS)
Health Resources & Services Administration (HRSA)
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: DODD, CHRISTINE
Covered Official Position (if applicable): SENATE "HELP" COMMITTEE
Name: MARKS, DEBRA L.
Covered Official Position (if applicable): N/A
Name: MCCULLOCH, EDGAR H. III
Covered Official Position (if applicable): N/A
Name: ORILEY, MARK
Covered Official Position (if applicable): N/A
Name: RAYMOND, BRIAN J.
Covered Official Position (if applicable): N/A
Name: RHONE, ADRIENNE G.
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: RET (one per page)

16. Specific lobbying issues:

H.R. 2830 Pension Protection Act of 2005 H.R. 4 Pension Protection Act of 2006 H.R. 2831
Pension Preservation and Portability Act of 2005 S. 1783 Pension Security and Transparency Act of 2005 Cash Balance Pension
Reform

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: DODD, CHRISTINE

Covered Official Position (if applicable): SENATE "HELP" COMMITTEE

Name: MARKS, DEBRA L.

Covered Official Position (if applicable): N/A

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: ORILEY, MARK

Covered Official Position (if applicable): N/A

Name: RAYMOND, BRIAN J.

Covered Official Position (if applicable): N/A

Name: RHONE, ADRIENNE G.

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: SCI (one per page)

16. Specific lobbying issues:

H.R. 2862 Science, State, Justice, Commerce, and Related Agencies Appropriations Act, 2006 Civilian DOE Appropriations - NSF Research Appropriations H.R. 5357 Research for Competitiveness Act H.R. 5358 Science & Math Ed. for Competitiveness Act, Sec. 9, Evaluation of Prof. Science Masters H.R. 4845 Innovation and Competitiveness Act S. 2197 Protecting America's Competitive Edge Act H.R. 5356 Early Career Research Act National Science Foundation Funding National Institute of Standards and Technology Funding Life Sciences Research Funding Innovation (Investment) R&D Funding Service Science S. 1614 Higher Education Reauthorization Act - Sec. 701, 705, 711 (Graduate Education) S. 2198 Protecting America's Competitive Edge Through Education and Research Act of 2006 (PACE) S. 2390 National Innovation Act -- Commerce Provisions S. 2802 American Innovation and Competitiveness Act of 2006 S. 2109 National Innovation Act of 2005 S. 3936 National Competitiveness Investment Act H.R. 5672 Appropriations Bill FY 2007, Commerce, Justice, Science, State - NSF Appropriations and Related Agencies No Child Left Behind Reauthorization

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

Commerce, Dept of (DOC)
Education, Dept of
Energy, Dept of
Executive Office of the President (EOP)
HOUSE OF REPRESENTATIVES
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: DOOD, CHRISTINE
Covered Official Position (if applicable): SENATE "HELP" COMMITTEE
Name: EDINGTON, PATRICIA J.
Covered Official Position (if applicable): N/A
Name: MARKS, DEBRA L.
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: RAYMOND, BRIAN J.
Covered Official Position (if applicable): N/A
Name: RHONE, ADRIENNE G.
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**

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 Taiwan-U.S. Tax Treaty 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 H.R. 1762/S. 750 on CFC Look-Through for Related Party Payments H.R. 1417/S. 1159 on Active Financing Under Section F H.R. 1736/S. 627 on the 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 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 Profit Attribution and Business Restructuring 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) H.R. 4297 Tax Relief Extension Reconciliation Act of 2005 H.R. 2830 Pension Security and Transparency Act of 2005 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. 5970 Estate Tax and Extension of Tax Relief Act of 2006 (ETETRA) 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

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

Commerce, Dept of (DOC)
Executive Office of the President (EOP)
HOUSE OF REPRESENTATIVES
Internal Revenue Service (IRS)
Nat'l Security Council (NSC)
SENATE
Securities & Exchange Commission (SEC)
State, Dept of (DOS)
Treasury, Dept of

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: DODD, CHRISTINE
Covered Official Position (if applicable): SENATE "HELP" COMMITTEE
Name: EVANS, LINDA C.
Covered Official Position (if applicable): N/A
Name: MARKS, DEBRA L.
Covered Official Position (if applicable): N/A
Name: ORILEY, MARK
Covered Official Position (if applicable): N/A
Name: PERRY, EDUMND F.
Covered Official Position (if applicable): N/A
Name: RAYMOND, BRIAN J.
Covered Official Position (if applicable): N/A
Name: RHONE, ADRIENNE G.
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:

International Telecommunications Regulatory Treatment of Internet Service Providers Spectrum Allocation/Spectrum Management
Telecommunications Reform H.R. 5252 Communications, Opportunity Promotion, and Enhancement Act of 2006 S. 2686
Communications, Consumer Choice, and Broadband Deployment Act of 2006

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

Commerce, Dept of (DOC)

Executive Office of the President (EOP)

Federal Communications Commission (FCC)

HOUSE OF REPRESENTATIVES

Natl Telecommunications & Information Administration (NTIA)

Office of Science & Technology Policy (OSTP)

SENATE

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: DOOD, CHRISTINE

Covered Official Position (if applicable): SENATE "HELP" COMMITTEE

Name: MARKS, DEBRA L.

Covered Official Position (if applicable): N/A

Name: ORILEY, MARK

Covered Official Position (if applicable): N/A

Name: RAYMOND, BRIAN J.

Covered Official Position (if applicable): N/A

Name: RHONE, ADRIENNE G.

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**

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 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.-Oman Free Trade Agreement 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.-Thailand Free Trade Agreement Export Controls Regulations Deemed Export Regulations Export Controls for the PRC 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 Trade Treatment of Remanufactured Goods China's WTO Accession Implementation China Government Procurement China WTO Government Procurement Agreement (GPA) Accession China Services-Related Issues China Standards-Related Issues Schumer/Graham Legislation on China Currency Manipulation S. 1048, S. 295, Amendment S. 309 to S. 600 H.R. 5199 U.S.-China Engagement Act of 2006 S. 2467 U.S. Trade Enforcement Act of 2006 WTO Accession - Russia Foreign Investment Open Standards/Open Source Global Sourcing India Government Procurement H.R. 4572 Export Administration Renewal Act of 2005 Proposed rulemaking concerning revisions and clarifications of export and re-export controls for China and new authorization validated end user. H.R. 6406, S. 3495 Vietnam PNTR Customs Classification Emerging Markets Asia Pacific Economic Cooperation Ministerial and Heads of State Meetings

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

Commerce, Dept of (DOC)
Council of Economic Advisers (CEA)
Defense, Dept of (DOD)
Executive Office of the President (EOP)
Export-Import Bank of the United States (EXIM Bank)
HOUSE OF REPRESENTATIVES
Homeland Security, Dept of (DHS)
Justice, Dept of (DOJ)
Nat'l Economic Council (NEC)
Nat'l Security Council (NSC)
Office of the Vice President of the United States
SENATE
State, Dept of (DOS)
Treasury, Dept of
U.S. Agency for International Development (USAID)
U.S. Trade Representative (USTR)

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: DODD, CHRISTINE
Covered Official Position (if applicable): SENATE "HELP" COMMITTEE
Name: GILLESPIE, EDWARD A.
Covered Official Position (if applicable): N/A
Name: MARKS, DEBRA L.
Covered Official Position (if applicable): N/A
Name: MARSHO, KIMBERLY M.
Covered Official Position (if applicable): N/A
Name: ORILEY, MARK
Covered Official Position (if applicable): N/A
Name: RAYMOND, BRIAN J.
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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

Name: STEWART, STEVEN W.

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**

Signature: ON FILE Date: Feb 14, 2007

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

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: RAYMOND, BRIAN J.

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 14, 2007

Printed Name and Title: -