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LOBBYING REPORT

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

1. Registrant name American Bankers Association Securities Assn (ABASA)			
2. Address <input type="checkbox"/> Check if different than previously reported 1120 Connecticut Avenue, N.W. Washington DC 20036 U			
3. Principal place of business (if different than line 2) City _____ State/Zip or Country _____			
4a. Contact Name Mrs. Sarah A. Miller	b. Telephone number (202) 663-5325	c. E-mail smiller@aba.com	5. Senate ID # 44468-00
7. Client Name <input checked="" type="checkbox"/> Self American Bankers Association Securities Association			6. House ID # 340770

TYPE OF REPORT 8. Year 2004 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 Activities

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

<p align="center">12. Lobbying Firms</p> <p>INCOME 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 type="checkbox"/> ⇨ \$ _____</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 align="center">13. Organizations</p> <p>EXPENSES 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 checked="" type="checkbox"/> ⇨ \$ _____ 50,000</p> <p>14. REPORTING METHOD. Check box to indicate exact accounting method. See instructions for description of options.</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA definitions</p> <p><input checked="" type="checkbox"/> Method B. Reporting amounts under section 6033(b) Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 162(e) Internal Revenue Code</p>
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Signature *Sarah A. Miller* Date *2/19/05*

Printed Name and Title Sarah A. Miller, Director

Registrant Name American Bankers Association Securities Client Name American Bankers Association Sec

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

15. General issue area code FIN - Financial Institutions/Investments/Securiti (one per page)

16. Specific lobbying issues

Implementing regulations for Public Law no. 106-102: Gramm-Leach-Bliley Financial Modernization Act of 1999:
a. Title II, Subtitle A - Brokers and Dealers

Implementing regulations for Public Law no. 107-56: USA Patriots Act of 2001
a. Title III - Money Laundering Abatement

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

Senate, Department of Treasury, House of Representatives, Federal Reserve Board, Office of the Comptroller of Currency, Federal Deposit Insurance Corporation, Office of Thrift Supervision, National Association of Securities Dealers, Municipal Securities Rulemaking Board, Securities and Exchange Commission

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

Name	Covered Official Position (if applicable)
Beth L. Climo	
J. Kevin A. McKechnie	
James D. McLaughlin	
Sarah A. Miller	

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

Signature *Sarah A. Miller* Date *2/10/05*

Registrant Name American Bankers Association Securities / Client Name American Bankers Association Se

ADDENDUM for General Lobbying Issue Area FIN

16. Specific lobbying issues (continued from previous page)

H.R. 1375 The Financial Services Regulatory Relief Act, Title V Cross Marketing
H.R. 2179 The Securities Fraud Deterrence and Investor Restitution Act of 2003
H.R. 2420 The Mutual Funds Integrity and Fee Transparency Act of 2003
H.R. 4505 Mutual Fund Reform Act of 2004
S. 509 The Energy Market Oversight Act
S. 1822 Mutual Fund Transparency Act of 2003
S. 1958 Mutual Fund Investor Protection Act of 2003
S. 1971 Mutual Fund Investor Confidence Restoration Act of 2003
S. 2059 Mutual Fund Reform Act of 2004
S. 2497 Small Investor Protection Act of 2004

Agencies:

Section 106 (b) of the Bank Holding Company Act Amendments of 1970

