

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
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 SECRETARY
05 FEB 16

LOBBYING REPORT

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

1. Registrant Name

Covington & Burling

 2. Address ☐ Check if different than previously reported.

1201 Pennsylvania Avenue, NW, Washington, DC 20004

3. Principal Place of Business (if different from line 2)

City:

State/Zip (or Country)

4. Contact Name

Richard C. Shea

Telephone

(202) 662-5599

Email (optional)

5. Senate ID #

11195-1558

 7. Client Name ☐ Self

AK Steel Corporation

6. House ID #

31827109
TYPE OF REPORT 8. Year **2004** Midyear (January 1-June 30) ☐ OR Year End (July 1-December)

 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 Act

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 for 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 reporting period were:

 Less than \$10,000 ☐

 \$10,000 or more ☐ ⇒ \$ _____
Expenses (nearest \$20,000)

14. REPORTING METHOD. Check box expense accounting method. See instruction description of options.

☐ **Method A.** Reporting amounts using LE definitions only

☐ **Method B.** Reporting amounts under section 6033(b)(8) of the Internal Revenue Code

☐ **Method C.** Reporting amounts under section 16 Internal Revenue Code

Signature  Date February 16, 2005
Printed Name and Title Richard C. Shea

Registrant Name

Covington & Burling

Client Name

AK Steel Corporation

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

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

16. Specific lobbying issues

Administrative guidance and legislation relating to cash balance defined benefit plans

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

☐ Check if None

United States Senate

United States House of Representatives

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

Name

Covered Official Position (if applicable)

Richard C. Shea

Robert S. Newman

19. Interest of each foreign entity in the specific issues listed on line 16 above

☒ Check if N



Signature  Date February 10, 2005
Printed Name and Title Richard C. Shea