

SECRETARY OF THE SENATE

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H. D.

February 14, 2000

Via Messenger

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

Clerk of the House of Representatives  
Legislative Resource Center  
B106 Cannon House Office Building  
Washington, D.C. 20515-6612

Ladies and Gentlemen:

Enclosed on behalf of COMSAT Corporation, for filing pursuant to Section 5 of the Lobbying Disclosure Act of 1995, is a Lobbying Report on Form LD-2 for the semi-annual period ended December 31, 1999. The form is being filed concurrently with both the Secretary of the Senate and the Clerk of the House of Representatives.

Please contact the undersigned at (301) 214-3605 if you have any questions concerning the enclosed form.

Sincerely,



David A. Dedman

Enclosure

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

SECRETARY OF THE SENATE  
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**LOBBYING REPORT**

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

1. Registrant Name COMSAT Corporation			
2. Address <input type="checkbox"/> Check if different than previously reported 6560 Rock Spring Drive, Bethesda, Maryland 20817			
3. Principal Place of Business (if different from line 2) City: _____ State/Zip (or Country) _____			
4. Contact Name David A. Dedman	Telephone (301) 214-3605	E-mail (optional)	5. Senate ID # 10376-12
7. Client Name <input checked="" type="checkbox"/> Self			6. House ID # 30840000

**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**

<p><b>12. Lobbying Firms</b></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"/> ⇒ \$ _____  <small>Income (nearest \$20,000)</small></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><b>13. Organizations</b></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"/> ⇒ \$ <u>1,060,000</u>  <small>Expenses (nearest \$20,000)</small></p> <p><b>14. REPORTING METHOD.</b> Check box to indicate expense accounting method. See instructions for description of options.</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA definitions only</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6013(b)(8) of the Internal Revenue Code</p> <p><input checked="" type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Internal Revenue Code</p>
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Signature \_\_\_\_\_

Printed Name and Title \_\_\_\_\_

Registrant Name COMSAT Corporation 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

S. 376, Open-market Reorganization for the Betterment of International Telecommunications Act, and H.R. 3261, the Communications Satellite Competition and Privatization Act of 1999, including provisions related to the amendment of the Communications Satellite Act of 1962 to promote competition in satellite communications, provisions related to the merger between COMSAT and Lockheed Martin, provisions related to INTELSAT privatization and U.S. market access, and direct access and fresh look provisions.

FCC IB Docket No. 98-192, FCC 99-236, 64 FR 54561, FCC proceeding on direct access to INTELSAT.

H.R. 791, An Act to amend the National Trail Act.

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

Check if None

U.S. House of Representatives  
U.S. Senate

Executive Office of the President  
Department of State  
Federal Communications Commission  
NTIA

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

Name	Covered Official Position (if applicable)	Yes
Beverly W. Andrews		<input type="checkbox"/>
James M. Carroll		<input type="checkbox"/>
Robert H. Dunkel		<input type="checkbox"/>
Johnathan F. Hynes		<input type="checkbox"/>
Howard D. Polsky		<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 \_\_\_\_\_

Printed Name and Title \_\_\_\_\_

Registrant Name COMSAT Corporation 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 FOR (one per page)

16. Specific lobbying issues

S.376, Open-market Reorganization for the Betterment of International Telecommunications Act, and H.R. 3261, the Communications Satellite Competition and Privatization Act of 1999, including provisions related to the amendment of the Communications Satellite Act of 1962 to promote competition in satellite communications, provisions related to the merger between COMSAT and Lockheed Martin, provisions related to INTELSAT privatization and U.S. market access, and direct access and fresh look provisions.

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

Check if None

U.S. House of Representatives  
U.S. Senate

Executive Office of the President  
Department of State  
Federal Communications Commission  
NTIA

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

Name	Covered Official Position (if applicable)	New
<u>Beverly W. Andrews</u>		<input type="checkbox"/>
<u>James M. Carroll</u>		<input type="checkbox"/>
<u>Robert H. Dunkel</u>		<input type="checkbox"/>
<u>Johnathan F. Hynes</u>		<input type="checkbox"/>
<u>Howard D. Polsky</u>		<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 \_\_\_\_\_

Printed Name and Title \_\_\_\_\_

**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

S.376, Open-market Reorganization for the Betterment of International Telecommunications Act, and H.R. 3261, the Communications Satellite Competition and Privatization Act of 1999, including provisions related to the amendment of the Communications Satellite Act of 1962 to promote competition in satellite communications, provisions related to the merger between COMSAT and Lockheed Martin, provisions related to INTELSAT privatization and U.S. market access, and direct access and fresh look provisions.

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H.R. 791, An Act to amend the National Trail Act.

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

Check if None

U.S. House of Representatives  
U.S. Senate

Executive Office of the President  
Department of State  
Federal Communications Commission  
NTIA

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

Name	Covered Official Position (if applicable)	New
Beverly W. Andrews		<input type="checkbox"/>
James M. Carroll		<input type="checkbox"/>
Robert H. Dunkel		<input type="checkbox"/>
Johnathan F. Hymes		<input type="checkbox"/>
Howard D. Polsky		<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 \_\_\_\_\_

Printed Name and Title \_\_\_\_\_

Registrant Name COMSAT Corporation Client Name Self

**Information Update Page - Complete ONLY where registration information has changed.**

20. Client new address

21. Client new principal place of business (if different from line 20)

City

State/Zip (or Country)

22. New general description of client's business or activities

**LOBBYIST UPDATE**

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

**ISSUE UPDATE**

24. General lobbying issues previously reported that no longer pertain

**AFFILIATED ORGANIZATIONS**

25. Add the following affiliated organization(s)

Name	Address	Principal Place of Business (city and state or country)

26. Name of each previously reported organization that is no longer affiliated with the registrant or client

**FOREIGN ENTITIES**

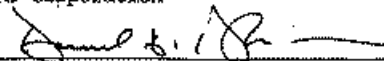
27. Add the following foreign entities

Name	Address	Principal place of business (city and state or country)	Amount of contribution for lobbying activities	Ownership percentage in client

28. Name of each previously reported foreign entity that no longer owns, or controls, or is affiliated with the registrant, client or affiliated organization

COMSAT Corporation

Signature By:



Date February 14, 2000

Printed Name and Title David A. DeGman, Assistant General Counsel