

LOBBYING REPORT

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

1. Registrant Name:

COVINGTON & BURLING LLP

2. Address:
1201 PENNSYLVANIA AVENUE, N.W., WASHINGTON, DC 20004

3. Principal place of business (if different from line 2):
Country: City: State/Zip(or Country):

4. Contact Name: STUART C. STOCK
Telephone: 202-662-5384
E-mail (optional): sstock@cov.com

Senate ID #: 11195-672
House ID #: 31827064

7. Client Name: Self

MICROSOFT CORP.

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): 780,000.00

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): _____

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

Registrant Name: COVINGTON & BURLING LLP Client Name: MICROSOFT CORP.

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:

Spyware legislation Data security legislation Phishing legislation Proposed privacy legislation

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

House
Senate

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

Name: EGAN, ERIN

Covered Official Position (if applicable):

Name: FAGAN, DAVID

Covered Official Position (if applicable):

Name: HANSEN, MARTIN

Covered Official Position (if applicable):

Name: JUCOVY, TIMOTHY

Covered Official Position (if applicable):

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

Registrant Name: COVINGTON & BURLING LLP Client Name: MICROSOFT CORP.

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:

Telecommunications legislation

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

House
Senate

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

Name: DEAN, JAMES

Covered Official Position (if applicable):

Name: WALDRON, GERARD

Covered Official Position (if applicable):

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:

Intellectual property provisions of free trade agreements. Interpretation and enforcement of the WTO Agreement on trade-related aspects of intellectual property rights. WTO negotiations on intellectual property and service issues. Work on trade- and comity-related aspects of the EU and Korean antitrust investigation.

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

White House, Senate, House, Office of U.S. Trade Representative, Department of Commerce, Department of State, Department of Justice, Federal Trade Commission

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

Name: CHEEK, MARNEY

Covered Official Position (if applicable):

Name: EIZENSTAT, STUART

Covered Official Position (if applicable):

Name: HANSEN, MARTIN

Covered Official Position (if applicable):

Name: LARSON, ALAN

Covered Official Position (if applicable): UNDER SECRETARY FOR ECONOMIC, BUSINESS AND

Name: MARCHICK, DAVID

Covered Official Position (if applicable):

Name: SELF, LAURIE

Covered Official Position (if applicable):

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

Signature: ON FILE Date: Aug 02, 2006

Printed Name and Title: Stuart C. Stock, Partner -