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LOBBYING REPORT

05 AUG 12 AM 10:02

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, N.W.

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

City: **Washington**

State/Zip (or Country) **DC/20**

4. Contact Name Telephone Email (optional)
Roderick A. DeArment 202-662-5900 rdearment@cov.com

5. Senate ID #
11195-75

7. Client Name Self
American Watch Association

6. House ID #
31827004

TYPE OF REPORT 8. Year **2005** 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 Ac

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 1 expense accounting method. See instruction description of options.

Method A. Reporting amounts using LD definitions only

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

Method C. Reporting amounts under 16 Internal Revenue Code

Signature _____ Date August 12, 2005
Printed Name and Title Roderick A. DeArment, Partner

DC: 599066-7

Registrant Name Covington & Burling

Client Name American Watch Association

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 code, provide information as requested. Attach additional page(s) as needed.**

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

16. Specific lobbying issues

**Worldwide reduction in watch tariffs
Amendments to United States Insular Possession Program
Tariff Simplification.
Virgin Islands drawback
Country of origin rules**

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

United States Trade Representative

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

Name

Covered Official Position (if applicable)

Roderick A. DeArment

David Grace

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

Signature  Date August 12, 2005
Printed Name and Title Roderick A. DeArment, Partner