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SECRETARY OF THE SENATE

99 AUG 13 PM 12:47

H. D.

LOBBYING REPORT

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

1. Registrant Name Hecht, Spencer & Associates			
2. Address <input type="checkbox"/> Check if different than previously reported 499 South Capitol Street, SW, #507			
3. Principal Place of Business (if different from line 2) City: Washington State/Zip (or Country) D.C. 20003			
4. Contact Name Nellie D. Grauel	Telephone (202) 554-2881	E-mail (optional) N/A	5. Senate ID # 17966-101
7. Client Name <input type="checkbox"/> Self J.C. Penney Company, Inc.			6. House ID # 31265-009

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	
12. Lobbying Firms	13. Organization
INCOME relating to lobbying activities for this reporting period was: Less than \$10,000 <input type="checkbox"/> \$10,000 or more <input checked="" type="checkbox"/> ⇒ \$ 60,000 Income (nearest \$20,000) 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).	EXPENSES relating to lobbying activities for this reporting period were: Less than \$10,000 <input type="checkbox"/> \$10,000 or more <input type="checkbox"/> ⇒ _____ Expenses (nearest \$20,000) 14. REPORTING METHOD. Check box to indicate expense accounting method. See instructions for description of options. <input type="checkbox"/> Method A. Reporting amounts using L.D.A. definitions only <input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code <input type="checkbox"/> Method C. Reporting amounts under section 162(c) of the Internal Revenue Code

Signature _____

Printed Name and Title _____

Registrant Name Hecht, Spencer & Associates Client Name J.C. Penney Company, Inc.

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 TAX (one per page)

16. Specific lobbying issues

- S.646 & H.R.1546 – Retirement Saving Opportunity Act of 1999
 - all provisions relating to highly compensated employees
- S.741 – Pension Coverage & Portability Act – all provisions relating to highly compensated employees
- H.R.1102 – Comprehensive Retirement Security & Pension Reform Act
 - all provisions relating to highly compensated employees
- H.R.2488 – Financial Freedom Act of 1999 – all provisions relating to highly compensated employees

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

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

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

Name	Covered Official Position (if applicable)	New
William H. Hecht		<input type="checkbox"/>
Timothy P. Hecht		<input type="checkbox"/>
Franklin C. Phifer, Jr.	Minority Counsel, House Ways & Means	<input type="checkbox"/>
Douglas S. Wiley		<input type="checkbox"/>
		<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 *William H. Hecht* Date August 12, 1999

Printed Name and Title William H. Hecht, President