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Washington, DC 20510

SECRETARY OF THE

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# LOBBYING REPO

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

1. Registrant Name  Organization  Individual

INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)

2. Address  Check if different than previously reported

Address1 1301 K STREET, NW Address2  
City WASHINGTON State DC Zip Code 20005 - Coun

3. Principal place of business (if different than line 2)

City Armonk State NY Zip Code 10504 - Coun

4a. Contact Name Mrs. LISA PALLUCONI b. Telephone Number (202) 515-4381 c. E-mail  
 International Number 5. Sen 1987

7. Client Name  Self INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM) 6. Hou 3112

TYPE OF REPORT 8. Year 2007 Midyear (January1-June30)  Year End (July 1-Dec)

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 Activ

## INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

### 12. Lobbying

INCOME relating to lobbying activities for this reporting period was:

Less than \$10,000

\$10,000 or more  \$

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

EXPENSE relating to lobbying activities for this reporting period were:

Less than \$10,000

\$10,000 or more  \$ 3,860,000.00

14. REPORTING Check box to indicate accounting method. See instructions for description

- Method A. Reporting amounts using LDA definition
- Method B. Reporting amounts under section 6033(c) Internal Revenue Code
- Method C. Reporting amounts under section 162(e) Internal Revenue Code

Signature  Digitally Signed By: Christopher G Caine Date 08/1  
US, DST ACES Business Representative, ACES TrustID Business Certificate, Christopher G Caine

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**Printed Name and Title** Christopher G. Caine, VP of Governmental Programs

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**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   (one per page)

16. Specific lobbying issues

Smart Power Grid  
 H.R. 6 Clean Energy Act of 2007  
 H.R. 2641/S. 1751 Energy and Water Development and Related Agencies Appropriations Act, 2008  
 Roadrunner Project

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

Department of Energy  
 Office of Science & Technology Policy  
 Federal Energy Regulatory Commission (FERC)  
 Environmental Protection Agency (EPA)

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Marija	Zivanovic-Smith		
Adrienne	Rhone		
Dana	Gray		
George	Southworth		
Lauren	Phelps		
Meredith	Singer		
Ned	McCulloch		
Mark	O'Riley		

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

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Printed Name and Title Christopher G. Caine, VP of Governmental Programs

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ADDENDUM for General Lobbying Issue Area: ENG - Energy/Nuclear

H.R. 2776 Renewable Energy and Energy Conservation Tax Act of 2007

H.R. 3221 New Direction for Energy Independence, National Security and Consumer Protection Act

S. 1419 Renewable Fuels, Consumer Protection, and Energy Efficiency Act of 2007

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**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   (one per page)

16. Specific lobbying issues

IBM has lobbied for various Government Programs, including Amtrak, Customs Modernization Program, IT Projects, and Government/Private Sector Research and Development Programs  
 Please see General Lobbying Area Codes: DEF, GOV, HCR, HOM, & SCI for the report on these issues.

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

Department of Defense	General Services Administration	CDC	Dept. of Educa
Executive Office of the President	Domestic Policy Council	DHS	Office of Scie
Office of Mangement and Budget	Department of HHS	Dept. of Energy	
Office of Federal Procurement Policy	FDA	Dept. of Commerce	

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Adrienne	Rhone		
Christine	Dodd		
Chris	Mustain		
Susan	Tuttle		
Ed.	Gillespie		
Bill	Warner		
Meredith	Singer		
David	Barnes		

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

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**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   (one per page)

16. Specific lobbying issues

Patent Reform  
S. 1145/H.R. 1908 Patent Reform Act of 2007  
Post-Patent-Grant Review

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

United States Trade Representative  
Department of Commerce  
Patent and Trademark Office  
Department of Defense, Department of State  
Department of Justice  
Federal Trade Commission

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Marc	Williams		
Tim	Sheehy		
Ned	McCulloch		
Meredith	Singer		
Dana	Gray		
George	Southworth		
Lauren	Phelps		

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

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Printed Name and Title Christopher G. Caine, VP of Governmental Programs

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ADDENDUM for General Lobbying Issue Area: CPT - Copyright/Patent/Trademark

Venue  
Damages Apportionment  
Enhanced Damages  
Fee Shifting  
Third Party Submission of Prior Act with Commentary  
Patent Claim Clarity  
Patent Quality  
Prior User Rights  
H.R. 3093/S. 1745 Commerce, Justice, Science and Related Agencies Appropriations Act, 2008  
Patent and Trademark Office Funding  
Community Patent Review  
University Technology Transfer  
Broadcast Flag  
Open Source Software  
Open Standards and Interoperability  
"Ex Ante" Disclosure of IP in standard-setting  
Interoperability and Competition Policy

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**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   (one per page)

16. Specific lobbying issues

H.R. 3222 Department of Defense Appropriations Act, FY 2007  
 H.R. 1585/S. 1547 National Defense Authorization Act, FY 2007  
 Enterprise Resource Planning (Navy)  
 eArmy University

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

Department of Defense

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Ed	Gillespie		
Bill	Warner		
Ned	McCulloch		
Meredith	Singer		
Dana	Gray		
George	Southworth		
Lauren	Phelps		

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

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ADDENDUM for General Lobbying Issue Area: DEF - Defense

Business Management Modernization  
Transformation Satellite Program  
DD(X) Destroyer Program  
Army Distributed Learning System  
Army Future Combat System  
Defense Transportation Coordination Initiative  
Air Force Personnel Services Delivery Transformation

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**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  Education  (one per page)

16. Specific lobbying issues

Educational Standards	Accessibility
Workforce Development	
Innovation (Talent)	

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

Department of Labor
Department of Commerce
Department of Education
National Science Foundation

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Susan	Tuttle		
Meredith	Singer		
Ned	McCulloch		
George	Southworth		
Dana	Gray		
Lauren	Phelps		
PJ	Edington		
Chris	Mustain		

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

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**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   (one per page)

16. Specific lobbying issues

Product Take-Back Legislation  
Draft "Energy Star Program"

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

Environmental Protection Agency

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Ed	Perry		
Ned	McCulloch		
Meredith	Singer		
Dana	Gray		
George	Southworth		
Lauren	Phelps		

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

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**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   (one per page)

16. Specific lobbying issues

H.R. 1585/S. 1547 National Defense Authorization Act, 2007  
Competitive Sourcing Provisions

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

Executive Office of the President  
Office of Management and Budget  
Office of Federal Procurement Policy  
General Services Administration  
Department of Defense  
Office of Procurement Policy

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Bill	Warner		
Ned	McCulloch		
Meredith	Singer		
Dana	Gray		
George	Southworth		
Lauren	Phelps		

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

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ADDENDUM for General Lobbying Issue Area: GOV - Government Issues

- Use of Government-Wide Acquisition Vehicles
- Use of Specialty Metals/Domestic Source Requirements
- Use of Time & Material Contracts
- Bid Protest of Task & Delivery Orders

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**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   (one per page)

16. Specific lobbying issues

H.R. 3176 State & Children Health Insurance Program - 2007 reauthorization (SCHIP)  
 S. 1456 Electronic Personal Health Records (PHRS) for Member of the Federal Employee Health Benefit Plans  
 H.R. 493/S. 358 Genetic Information Nondiscrimination Act of 2007  
 S. 558 Mental Health Parity Act of 2007

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

Executive Office of the President	Department of Health and Human Services	Human Resource and Servi
Department of Defense	Centers for Disease Control and Prevention	Food and Drug Administrat
Domestic Policy Council	National Institutes of Health	

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Ned	McCulloch		
David	Barnes		
Meredith	Singer		
Dana	Gray		
Christine	Dodd		
George	Southworth		
Lauren	Phelps		

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

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Printed Name and Title Christopher G. Caine, VP of Governmental Programs

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ADDENDUM for General Lobbying Issue Area: HCR - Health Issues

S. 1418 Wired for Healthcare Quality Act

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**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 HOM Homeland Security (one per page)

16. Specific lobbying issues

Supply Chain Security and Air Cargo Security  
H.R. 1/S. 4 Implementing Provisions of the 9/11 Commission Act

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

Department of Homeland Security  
Bureau of Customs and Border Protection  
Transportation Security Agency

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Kim	Marsho		
Steve	Stewart		
Ned	McCulloch		
Meredith	Singer		
Dana	Gray		
Geroge	Southworth		
Lauren	Phelps		

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

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**Printed Name and Title** Christopher G. Caine, VP of Governmental Programs

v5.0.0j

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**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   (one per page)

16. Specific lobbying issues

H.R. 3176 SCHIP Reauthorization and Reform Act of 2007  
 H.R. 3162 Children's Health and Medicare Protection (CHAMP) Act of 2007

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

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Ned	McCulloch		
David	Barnes		
Meredith	Singer		
Dana	Gray		
George	Southworth		
Lauren	Phelps		
Christine	Dodd		

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

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**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 RET Retirement (one per page)

16. Specific lobbying issues

S. 708 Health Care and Training for Older Workers Act  
 Deferred Compensation Provisions (proposed) to be used to raise revenue for other legislation (pending)

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

Department of Labor

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Ned	McCulloch		
David	Barnes		
Dana	Gray		
Meredith	Singer		
Christine	Dodd		
George	Southworth		
Lauren	Phelps		

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

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**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   (one per page)

16. Specific lobbying issues

H.R. 362 10,000 Teachers, 10 Million Minds Science and Math Scholarship Act  
 H.R. 363 Sowing the Seeds Through Science and Engineering Research Act  
 H.R. 1867 National Science Foundation Authorization Act of 2007  
 H.R. 1868 Technology Innovation and Manufacturing Stimulation Act of 2007

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

National Science Foundation  
 Department of Commerce  
 Department of Education

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Chris	Mustain		
Susan	Tuttle		
Ned	McCulloch		
Meredith	Singer		
George	Southworth		
Dana	Gray		
Lauren	Phelps		
PJ	Edington		

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

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ADDENDUM for General Lobbying Issue Area: SCI - Science/Technology

H.R. 2272 21st Century Competitiveness Act of 2007

H.R. 2641/S. 1751 Energy and Water Development and Related Agencies Appropriations Act, 2008 (DOE Office of Science Appropriations)

Department of Energy funding - Office of Science

H.R. 3093/S. 1745 Commerce, Justice, Science, and Related Agencies Appropriations Act, 2008 (NSF & NIST Appropriations)

S. 761 America COMPETES Act

National Science Foundation Funding

National Institute on Standards and Technology Funding

Innovation

Service Science

R&D Funding

China Innovation Policy

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**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 Taxation/Internal Revenue Code (one per page)

16. Specific lobbying issues

Negotiation and Ratification of Bilateral Income Tax Treaties  
 U.S.-Canada Tax Treaty  
 Revision of Tax Provisions in U.S. Model Treaty  
 Taiwan-U.S. Tax Agreement

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

Executive Office of the President  
 National Economic Advisory Council  
 Department of Treasury  
 Internal Revenue Service  
 Department of Commerce  
 Department of State  
 United States Trade Representative

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Linda	Evans		
Ed	Perry		
Ned	McCulloch		
Meredith	Singer		
Dana	Gray		
George	Southworth		
Lauren	Phelps		

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

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ADDENDUM for General Lobbying Issue Area:

TAX - Taxation/Internal Revenue Code

U.S.-Brazil Tax Treaty  
U.S.-Germany Tax Treaty  
U.S.-Sweden Tax Treaty  
U.S.-Korea Tax Treaty  
U.S.-Italy Tax Treaty  
U.S.-Spain Tax Treaty  
Revision of Internal Revenue Code Subpart F on Deferral of Taxation  
Section 954 (c) 6 CFC Look-Through for Related Party Payments  
Section 954 (h) Active Financing Under Section F  
H.R. 2138/S. 41 R&D Tax Credit  
Treasury "Check-the-Box" Regulations  
Taxation of Software (Section 18) Regulations  
Taxation of Internet Transactions and Software  
Fundamental Tax Reform - Tax Reform Advisory Panel and Various Congressional Hearings  
Internet Taxation and Business Activity Tax (BAT)  
European Union VAT on Outsourced Financial Services  
Research and Development Tax Credit Regulations  
Research and Development Tax Credit Refinement - Alternative Simplified Credit  
Securities and Exchange Commission Implementation of P.L. 107-204 Sarbanes-Oxley Act of 2002  
Permanent Establishment (PE) Rules for Profit Attribution and Business Restructuring in OECD  
Section 199 Domestic Production Deduction Regulation  
Treatment of Cross-Licensing Agreements under IRC (tax code)  
Treasury Regulations on Contract Manufacturing  
Revenue Ruling 97-48, Revenue Ruling 75-7, and Related Code System  
Treasury Sections 1.954-3  
Field Service Advisory (FSA)  
Economic Substance Doctrine Codification  
H.R. 4297 Tax Increase Prevention and Reconciliation Act of 2005  
Substantial Assistance rule under Treasury Reg. S.1.954  
"Contract Manufacturing" rule under Treasury Reg. S.1.954  
Extension of Tax Relief Act of 2006  
H.R. 1591 Minimum Wage

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**Printed Name and Title** Christopher G. Caine, VP of Governmental Programs

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**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 Telecommunications (one per page)

16. Specific lobbying issues

International Telecommunications Special Access Rate Reform  
 Regulatory Treatment of Internet Service Providers  
 Spectrum Allocation/Spectrum Management  
 Telecommunications Reform

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

Federal Communications Commission

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Cheryl	Bruner		
Steve	Stewart		
Ned	McCulloch		
Meredith	Singer		
Dana	Gray		
George	Southworth		
Lauren	Phelps		

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

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**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  Trade (Domestic/Foreign) (one per page)

16. Specific lobbying issues

Customs Classification  
 Emerging Markets  
 Asia Pacific Economic Cooperation  
 Ministerial and Heads of State Meetings

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

Executive Office of the President	National Security Council	Dept. of Treasury
Office of the U.S. Trade Rep.	Office of Deputy Secy.	U.S. Customs & Border Protection
National Economic Council	Office of the Vice Pres.	Dept. of State
Council of Economic Advisors	Dept. of Commerce	Dept. of Homeland Security

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Christopher	Caine		
Lauren	Phelps		
Ned	McCulloch		
Meredith	SingerMarks		
Dana	Gray		
George	Southworth		
Ed	Gillespie		
Kim	Marsho		
Steve	Stewart		

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

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ADDENDUM for General Lobbying Issue Area: **TRD - Trade (Domestic/Foreign)**

Electronic Commerce Trade Policy  
World Trade Organization (WTO) Work Program on E-Commerce  
WTO Trade Classification  
WTO Government Procurement Agreement  
Membership Expansion  
Adherence to the WTO Government Procurement Agreement  
Trade Agreements Act  
U.S.-Peru Free Trade Agreement  
U.S.-Colombia Free Trade Agreement  
U.S.-Korea Free Trade Agreement  
U.S.-Malaysia Free Trade Agreement  
U.S.-Panama Free Trade Agreement  
U.S.-Thailand Free Trade Agreement  
Export Controls Regulations  
Deemed Export Regulations  
Export Controls for the PRC  
Microprocessor and Computer Export Regulations - Radiation Hardness  
Semiconductor Export Regulations  
New Computer Metric to Replace MTOPS  
WTO Information Technology Agreement  
WTO-Doha Development Agenda  
WTO Tech Barriers to Trade (TBT) Agreement  
WTO Non-Agriculture Market Access  
WTO Trade Facilitation  
WTO GATS Negotiations  
Trade Treatment of Electronically Delivered Software  
Trade Treatment of Remanufactured Goods  
Trade Facilitation  
China's WTO Accession Implementation  
China Government Procurement  
China WTO Government Procurement Agreement (GPA) Accession  
China Services-Related Issues  
Baucus-Grassley S. 1607 The Currency Exchange Rate Oversight and Reform Act of 2007  
China  
Strategic Economic Dialogue  
Joint Commission on Commerce & Trade (JCCT)  
Joint Economic Commission (JEC)  
Open Standards/Open Source  
Global Sourcing  
India Government Procurement  
Proposed rulemaking concerning revisions and clarifications of export and re-export controls for China and new authorized end user.  
S. 1612 International Emergency Economic Powers Act  
Trade Promotion Authority (TPA)  
Services Caucus  
Dodd-Shelby S. 1677 The Currency Reform & Financial Markets Access Act of 2007  
Davis-English H.R. 1229 Non-Market Economy Trade Remedy Act of 2007  
Baucus-Snow S. 122 Trade Adjustment Assistance Improvement Act of 2007  
Stabenow-Bunning S. 796 Fair Currency Act of 2007  
Ryan-Hunter H.R. 2942 Currency Reform for Fair Trade Act of 2007

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**Printed Name and Title** Christopher G. Caine, VP of Governmental Programs

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**Printed Name and Title** Christopher G. Caine, VP of Governmental Programs

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Page

Registrant

INTERNATIONAL BUSINESS MACHINES CORPORATION

Client Name

INTERNATIONAL BUSINESS MACHINES CORPORAT

**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   (one per page)

16. Specific lobbying issues

S. 495 Personal Data Privacy & Security Act of 2007  
S. 239 Notification of Risk to Personal Data Act of 2007  
S. 1178 Identity Theft Prevention Act  
S. 1260 Data Security Act of 2007

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

Department of Commerce  
Federal Trade Commission

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

Name			Covered Official Position (if applicable)
First	Last	Suffix	
Ned	McCulloch		
Dana	Gray		
George	Southworth		
Lauren	Phelps		
Meredith	Singer		
Tim	Sheehy		
Katie	Ignawszewski		

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

[Empty box for foreign entity interest information]

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ADDENDUM for General Lobbying Issue Area: CPI - Computer Industry

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

20. Client new address

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_ - \_\_\_\_\_ Cou \_\_\_\_\_

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

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_ - \_\_\_\_\_ Cou \_\_\_\_\_

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

**LOBBYIST UPDATE**

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

	First Name	Last Name	Suffix		First Name	Last Name
1	Marija	Zivanovic-Smith		3		
2				4		

**ISSUE UPDATE**

24. General lobbying issue that no longer pertain

**AFFILIATED ORGANIZATIONS**

25. Add the following affiliated organization(s)

Name	Address				Principal Place of Business (city and state or country)
	Street Address City	State/Province	Zip	Country	
					City State Country

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

1	2	3
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**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
	Street Address City	State/Province	Country		
				City State Country	

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

1	3	5
2	4	6

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