

00 FEB 16 AM 9:01

# LOBBYING REPORT

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

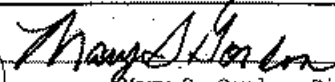
1. Registrant Name Nortel Networks			
2. Address <input type="checkbox"/> Check if different than previously reported 801 Pennsylvania Avenue, NW, Suite 700, Washington, DC 20004			
3. Principal Place of Business (if different from line 2) City: _____ State/Zip (or Country) _____			
4. Contact Name Mary Gordon	Telephone (202) 508-3608	E-mail (optional)	5. Senate ID # 29540-12
7. Client Name <input checked="" type="checkbox"/> Self	6. House ID #		

**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 checked="" type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> → \$ _____  <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 checked="" type="checkbox"/> Method A. Reporting amounts using LDA definitions only</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Internal Revenue Code</p>

Signature   
 Printed Name and Title Mary S. Gordon, Director, Government Relations, Congressional Affairs

Registrant Name Nortel Networks 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 TRD (one per page)

16. Specific lobbying issues

Export Administrative Act  
Sanctions  
International Business Support  
Fast Track Negotiating Authority  
Normal Trade Relations (NTR) - China

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

U. S. Senate  
U. S. House of Representatives  
Department of State  
Department of Treasury

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

Name	Covered Official Position (if applicable)	New
Mary Gordon		<input type="checkbox"/>
Susan Phillips		<input type="checkbox"/>
Melanie Carter-McGuire		<input type="checkbox"/>
Elizabeth Kanter		<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 Mary S. Gordon Date 2/14/00  
Printed Name and Title Mary S. Gordon, Director, Government Relations, Congressional Affairs

Registrant Name Nortel Networks 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 TDC (one per page)

16. Specific lobbying issues

Implementation of the Telecommunications Act of 1996  
Implementation of the Communications Assistance for Law Enforcement Act  
Spectrum Allocation  
Third Generation Wireless

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

U. S. Senate  
U. S. House of Representatives  
FCC  
Department of Commerce (NTIA)  
Department of State

U. S. Department of Commerce (ITA)  
The White House  
Office the Vice President  
U. S. Trade Representative

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

Name	Covered Official Position (if applicable)	New
Mary Gordon		<input type="checkbox"/>
Susan Phillips		<input type="checkbox"/>
Ray Strassburger		<input type="checkbox"/>
Julie Hedlund		<input type="checkbox"/>
Melanie Carter-Maguire		<input type="checkbox"/>
Elizabeth Kanter		<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 *Mary A. Gordon* Date 2/14/00  
Printed Name and Title Mary S. Gordon, Director, Government Relations, Congressional Affairs

Registrant Name Nortel Networks Client Name self

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

16. Specific lobbying issues

R&D Tax Credit

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

U.S. Senate  
U.S. House of Representatives  
U.S. Department of Treasury

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

Name	Covered Official Position (if applicable)	New
Mary S. Gordon		<input type="checkbox"/>
Susan A. Phillips		<input type="checkbox"/>
		<input type="checkbox"/>
		<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 *Mary S. Gordon* Date 2/14/00  
Printed Name and Title Mary S. Gordon, Director, Government Relations, Congressional Affairs

Registrant Name Nortel Networks Client Name self

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

16. Specific lobbying issues

H-1B Visa

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

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

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

Name	Covered Official Position (if applicable)	New
Mary S. Gordon		<input type="checkbox"/>
Susan A. Phillips		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

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

Signature *Mary S. Gordon* Date 2/14/00  
Printed Name and Title Mary S. Gordon, Director, Government Relations, Congressional Affairs

Registrant Name Nortel Networks Client Name self

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

16. Specific lobbying issues

Y2K

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
Mary S. Gordon		<input type="checkbox"/>
Susan Phillips.		<input type="checkbox"/>
		<input type="checkbox"/>
		<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 Mary S. Gordon Date 0/14/00

Printed Name and Title Mary S. Gordon, Director, Government Relations, Congressional Affairs