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Clerk of the House of Representatives Secretary of the Senate Legislative Resource Center B-106 Cannon Building Washington, DC 20515

Office of Public Records 232 Hart Building Washington, DC 20510

LOBBYING REPORT

SECRETARY OF THE SE

05 JAN 13 PM 1:

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, NW

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

	City: Washington		State/Zip (or	r Co	untry) DC 20(
4.	Contact Name Harvey Applebaum	Telephone 202-662-5626	Email (optional)	5.	Senate ID # 11195-1852
7.	Client Name Self The Goodyear Tire &	Rubber Company		6.	House ID # 31827125

TYPE OF REPORT 8. Year 2004 Midyear (January 1-June 30) OR Year End (July1-December

9. Check if this filing amends a previously filed version of this report \Box

⇒ Termination Date _____ 11. No Lobbying Ac 10. Check if this is a Termination Report

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

12. Lobbying Firms	13. Organizations		
INCOME relating to lobbying activities for this reporting period was:	EXPENSES relating to lobbying activities for reporting period were:		
Less than \$10,000 🛛	Less than \$10,000		
\$10,000 or more $\square \Leftrightarrow \$_{\text{Income (nearest $20,000)}}$	\$10,000 or more □		
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.)	14. REPORTING METHOD. Check box expense accounting method. See instruc description of options.		
childy for folloying derivines on behan of the entering	Method A. Reporting amounts using LL definitions only		
	Method B. Reporting amounts under sec 6033(b)(8) of the Internal R Code		
	Method C. Reporting amounts under 16 Internal Revenue Code		

Signature		<u> </u>	<u>January 15, 2005</u>
Printed Name and Ti	le Harve	y Applebaum	



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Registrant Name	Covington & Burling	Client Name	The Goodyear Tire & Rubbe
			Company

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in v 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 - Trade (Domestic &	k Foreign) (one per page))
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16. Specific lobbying issues

Congressional position on possible review by Department of Commerce of scope of antidumping an countervailing duty orders regarding imports of carbon steel wire rod.

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

Check if None

Senate

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

Name	Covered Official Position (if applicable)		
Harvey Applebaum			
19. Interest of each foreign entity in the specific issue	ues listed on line 16 above	k if N	
Filing #b7f7b028-8fb2-4ec4-9b77-18f5	a23ddd42 - Page 3 of 4	5	

Signature NI		Date	January 13, 4000
Printed Name and Title	Harvey Applebaum		