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LOBBYING REPORT

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

1. Registrant Name Covington & Burling			
2. Address <input type="checkbox"/> 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 Jack L. Schenendorf		Telephone (202) 662-5321	Email (optional) jschenendorf@cov.com
5. Senate ID # 11195-811			
7. Client Name <input type="checkbox"/> Self Qualcomm, Incorporated		6. House ID # 31827074	

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

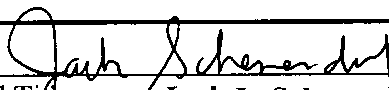
9. Check if this filing amends a previously filed version of this report ☐

10. Check if this is a Termination Report ☐ ⇨ Termination Date _____ 11. No Lobbying Act

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

12. Lobbying Firms	13. Organizations
<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 checked="" type="checkbox"/> ⇨ \$ <u>160,000</u> Income (nearest \$20,000)</p> <p>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.)</p>	<p>EXPENSES relating to lobbying activities for reporting period were:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> ⇨ \$ _____ Expenses (nearest \$20,000)</p> <p>14. REPORTING METHOD. Check box for reporting method. See instruction description of options.</p> <p><input checked="" type="checkbox"/> Method A. Reporting amounts using LLI definitions only</p> <p><input type="checkbox"/> Method B. Reporting amounts under sec 6033(b)(8) of the Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under 16 Internal Revenue Code</p>

Signature



Date February 14, 2005

Printed Name and Title

Registrant Name Covington & BurlingClient Name Qualcomm, Incorporated

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in 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 TRA (one per page)

16. Specific lobbying issues

Tax treatment of intelligent vehicle systems

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

☐ Check if None

US House of Representatives

US Department of Transportation

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

Name

Covered Official Position (if applicable)

Jack Schenendorf

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

☒ Check if None

Signature _____

Date February 14, 2005

Printed Name and Title **Jack I. Schenendorf**

