

Registrant Name **Davis & Harman LLP**

Client Name **Delta Airlines, Inc.**

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Attach additi needed.

15. General issue area code **RET** (one per page)

16. Specific lobbying issues

Application of funding rules to Delta defined benefit plans. S. 861/H.R. 2106, Employee Pension Preservation Act; H.R. 2 Protection Act; S. 219, National Employee Savings and Trust Equity Guarantee Act.

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

Check if None

**House of Representatives
Senate
Treasury**

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

Name	Covered Official Position (if applicable)
Randolf Hurst Hardock	
James M. Delaplane, Jr	
Kent A. Mason	

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

Check if None

Signature



Date

9/2/05

LD-2 (Rev. 06/98)