

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

Secretary of the Senate
Office of Public Records
232 Hart Building
Washington, DC 20510

SECRETARY OF THE SENATE

05 FEB 14 PM 5:13

LOBBYING REPORT

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

1. Registrant Name International Business Machines Corporation (IBM)			
2. Address <input type="checkbox"/> Check if different than previously reported 1301 K Street, N.W., Washington, D.C. 20005-3307			
3. Principal Place of Business (if different from line 2) City: Armonk State/Zip (or Country) New York 10504			
4. Contact Name Marcus P. Williams	Telephone (202) 515-5522	E-mail (optional) marcwill@us.ibm.com	5. Senate ID 19877-
7. Client Name <input checked="" type="checkbox"/> Self			6. House ID 311231

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

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

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

<p align="center">12. Lobbying Firms</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"/> ⇒ \$ _____ Income (nearest \$20,000)</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 align="center">13. Organizations</p> <p>EXPENSES relating to lobbying activities for this period were:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input checked="" type="checkbox"/> ⇒ \$ <u>3,080,000</u> Expenses (nearest \$20,000)</p> <p>14. REPORTING METHOD. Check box to indicate accounting method. See instructions for descriptions.</p> <p><input checked="" type="checkbox"/> Method A. Reporting amounts using LDA disclosure</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 172 of Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 179 of Internal Revenue Code</p>
---	---

Signature _____

Printed Name and Title _____

See Page 48

LD-2 (REV. 6/98)

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

H. R. 4766/S. 2803 Department of Agriculture, Rural Development, Food and Drug Administration
 Related Agencies Appropriations, FY 2005
 National Animal Identification System

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

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patricia J. Edington	
Debra L. Marks	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

International Business Machines Corporation (

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area ANI**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Steven W. Stewart
..... William H. Warner
.....
.....
.....
.....
.....
.....
.....

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

Air Cargo Security

S. 2393 Aviation Security Advancement Act

H.R. 4567 Department of Homeland Security Appropriations, 2005

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

Check if None

House of Representatives

Senate

Department of Homeland Security

Transportation Security Administration

Border and Transportation Security

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patricia J. Edington	
Debra L. Marks	
Kimberly M. Marsho	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Steven W. Stewart	

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

Check if None

Signature _____ Date _____

Printed Name and Title _____

See Page 48

Form LD-2 (Rev. 6/98)

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

IBM has lobbied for various Government Programs, including Amtrak, Customs Modernization Program, IT Projects, Patent and Trademark Office, Government/Private Sector Research and Development Programs, and Health Information Technology
Please see General Lobbying Area Codes ANI, AVI, CPT, DEF, GOV, HCR, HOM, RRR, and for the report on these issues.

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

House of Representatives
Senate

See General Lobbying Issue Area Codes ANI, AVI, CPT, DEF, GOV, HCR, HOM, RRR, and

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

Name	Covered Official Position (if applicable)
See General Lobbying Issue Area Codes ANI, AVI, CPT, DEF, GOV, HCR, HOM, RRR, and SCI	

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

See General Lobbying Issue Area Codes ANI, AVI, CPT, DEF, GOV, HCR, HOM, RRR, and

Signature _____ Date _____

Printed Name and Title _____

See Page 48

Form LD-2 (Rev. 6/98)

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each co information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- Cybersecurity Research and Development
- Freedom of Information Act (FOIA)
 - Critical Infrastructure Information Sharing
- Government Evaluation/Certification of Security Products
- National Strategy to Secure Cyberspace
- Security-Related Standards
- Corporate Governance - Security

(See Attached Continuation Sheet)

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

Check if None

- House of Representatives
- Senate
- Executive Office of the President
 - Homeland Security Council
 - National Security Council
 - Office of Management and Budget

(See Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Roslyn Docktor	
Patricia J. Edington	
Timothy B. Hackman	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
(See Attached Continuation Sheet)	

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

Check if None

Signature _____ Date _____

Printed Name and Title _____

See Page 48

Form LD-2 (Rev. 6/98)

International Business Machines Corporation (

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area CPI**

16. Specific lobbying issues

Security Technology Mandates

Structure of Department of Homeland Security

S. 1350 Notification of Risk to Personal Data Act

H.R. 4570 To Amend Provisions of Law Enacted by the Clinger-Cohen Act

PL 107-296, Title 8, Subtitle G, Support Antiterrorism by Fostering Effective Technolog
Act (SAFETY Act)

Risk Sharing for Homeland Security Technology and Services

Use of Open Source Software by U.S. Government

International Business Machines Corporation (

**Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area CPI**

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

Department of Commerce

Critical Infrastructure Assurance Office

National Institute of Standards

Department of Homeland Security

Office of General Counsel

Science and Technology Directorate

Safety Act Office

Information Analysis and Infrastructure Protection Directorate

National Cyber Security Division

International Business Machines Corporation (

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area CPI**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
Adrienne G. Rhone		
Timothy J. Sheehy		
Gregory W. Waddell		

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- Privacy
- Spyware

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

- House of Representatives
- Senate
- Department of Commerce
- International Trade Administration
- Federal Trade Commission

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patricia J. Edington	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

Printed Name and Title _____

See Page 48

Form LD-2 (Rev. 6/98)

1

International Business Machines Corporation (

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area CSP**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
Timothy J. Sheehy		
Gregory W. Waddell		

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

- 16. Specific lobbying issues
 - Open Source Software
 - Open Source Use in the Public Sector
 - Patent and Trademark Office Funding
 - Patent Fee Withholding
 - Patent and Trademark Office Strategic Plan
 - Patent Quality

(See Attached Continuation Sheet)

- 17. House(s) of Congress and Federal agencies contacted
 - Congress
 - General Accounting Office
 - House of Representatives
 - Senate
 - Executive Office of the President
 - Office of Management and Budget
 - Office of the United States Trade Representative

- Check if None
 - Department of Commerce
 - Patent and Trademark Office
 - Department of Defense
 - Department of State

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Cheryl L. Bruner	
Patricia J. Edington	
Timothy B. Hackman	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

Printed Name and Title _____

See Page 48

Form LD-2 (Rev.6/98)

1

International Business Machines Corporation (

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area CPT**

16. Specific lobbying issues

Patent Reexamination

Post-Patent-Grant Review

Software Patents

H.R. 107 Digital Media Consumer Rights Act of 2003

H.R. 909 Legislation to Direct the PTO Director to Adjust Patent Fees

H.R. 1066 Benefit Authors without Limiting Advancement or Net Consumer Expectations
(BALANCE) Act of 2003

H.R. 1561/S. 1760 United States Patent and Trademark Fee Modernization Act of 2003

H.R. 2929 Securely Protecting Yourself Against Cyber Trespass Act (SPY Act)

H.R. 3632 Anti-Counterfeiting Amendments Act of 2004

H.R. 4754 Departments of Commerce, Justice, and State, the Judiciary, and Related Agenci
Appropriations Act, 2005

Patent and Trademark Office Funding

H.R. 4818 Consolidated Appropriations Act, FY 2005

H.R. 5299 Patent Quality Assistance Act of 2004

S. 2237 Protecting Intellectual Rights Against Theft and Expropriation Act of 2004

S. 2560 Inducing Infringements of Copyrights Act of 2004

Smart Buy (Federal Software Procurement Regulation)

International Business Machines Corporation (

Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area CPT

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Adrienne G. Rhone
..... Timothy J. Sheehy
..... Gregory W. Waddell
.....
.....
.....
.....
.....

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each co information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues
H.R. 4200/S. 2400 National Defense Authorization Act, 2005
Export Controls Sections 1404, 1405, 1407
Enterprise Resource Planning (Navy)
eArmy University
Business Management Modernization

17. House(s) of Congress and Federal agencies contacted (See Attached Continuation Sheet)
 Check if None
Department of Commerce
House of Representatives
Senate

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Edward A. Gillespie	
Patricia J. Edington	
Debra L. Marks	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

Printed Name and Title _____

See Page 48

Form LD-2 (Rev. 6/98)

International Business Machines Corporation (

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area DEF**

16. Specific lobbying issues (Cont'd)

H.R. 4818 Consolidated Appropriations Act, FY 2005
Enterprise Resource Planning (Navy)
Business Management Modernization
eArmy Univeristy

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

- 16. Specific lobbying issues
 - Educational Standards
 - Workforce Development

- 17. House(s) of Congress and Federal agencies contacted
 - House of Representatives
 - Senate
 - Executive Office of the President
 - Domestic Policy Council
 - National Economic Council
 - Office of Science and Technology Policy
 - Department of Education

Check if None
Department of Commerce

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
David N. Barnes	
Patricia J. Edington	
Edgar H. McCulloch III	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	

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

Signature _____ Date _____

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. **Using a separate page for each code** information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues
 H.R. 5025/S. 2806 Transportation/Treasury and Independent Agencies Appropriations Act, 2005
 Electronic Records Archives
 H.R. 4200/S. 2400 National Defense Authorization Act, 2005
 Competitive Sourcing Provisions
 Use of GSA Client Support Centers
 Use of Government-Wide Acquisition Vehicles
 Accessibility

17. House(s) of Congress and Federal agencies contacted
 House of Representatives Check if None
 Senate Department of Defense
 Executive Office of the President Office of Procurement Policy
 Office of the United States Trade Representative
 Office of Management and Budget
 Office of Federal Procurement Policy
 General Services Administration
 The Access Board

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patricia J. Edington	
Debra L. Marks	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
(See Attached Continuation Sheet)	

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

Signature

Date

Printed Name and Title _____

See Page 48

Form LD-2 (Rev. 6/98)

Pa

International Business Machines Corporation (

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area GOV**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
Steven W. Stewart		
William H. Warner		

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

Health Information Technology
 H.R. 5006 Departments of Labor, Health and Human Services, and Education, and Related
 Agencies Appropriations Act, 2005
 Health Information Technology

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

Check if None

House of Representatives
 Senate
 Executive Office of the President
 Department of Health and Human Services
 Centers for Disease Control and Prevention
 National Institutes of Health
 Center for Medicare/Medicaid Services
 Human Resource and Services Administration

(See Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
David N. Barnes	
Patricia J. Edington	
Edgar H. McCulloch III	
Debra L. Marks	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Check if None

Signature _____ Date _____

International Business Machines Corporation (

**Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area HCR**

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

Department of Health and Human Services (Cont'd)

Agency for Healthcare Research and Quality

Food and Drug Administration

Department of Defense

Domestic Policy Council

National Economic Council

International Business Machines Corporation (

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area HCR**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
Paul G. Redifer		
Adrienne G. Rhone		

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each co information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

H.R. 4567/S. 2537 Homeland Security Appropriations Act, 2005

Customs Modernization

Flood Map Modernization

U.S. VISIT (United States Visitor and Immigration Status Indicator Technology)

CAP WIN (Capitol Wireless Integrated Network)

EMERGE2 (Electronically Managing Enterprise Resources for Government Efficiency Effectiveness)

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

House of Representatives

Senate

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Roslyn Docktor	
Patricia J. Edington	
Debra L. Marks	
Edmund F. Perry	
Brian J. Raymond	
Paul G. Redifer	
(See Attached Continuation Sheet)	

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

See Addendum

Signature _____ Date _____

International Business Machines Corporation (

Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area HOM

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Adrienne G. Rhone
..... Steven W. Stewart
..... William H. Warner
.....
.....
.....
.....
.....
.....

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each cot information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- H. R. 2849/S. 1452 USA Jobs Protection Act of 2003
- S. 1635 L-1 Visa (Intercompany Transferee) Reform Act of 2003
- H.R. 4166 American Workforce Improvement and Jobs Protection Act
- H. R. 4415 Save American Jobs Through L Visa Reform Act of 2004
- H.R. 4818 Consolidated Appropriations Act, FY 2005
- L-1 Visa (Intracompany Transferee) Reform Act of 2004
- H-1B Visa Reform Act of 2004

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

House of Representatives

Senate

Department of Homeland Security

U. S. Citizenship and Immigration Services

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
David N. Barnes	
Patricia J. Edington	
Debra L. Marks	
Brian J. Raymond	
Paul G. Redifer	
Adrienne G. Rhone	
Marija Zivanovic-Smith	

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

See Addendum

Signature _____ Date _____

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues
Health Information Technology

- 17. House(s) of Congress and Federal agencies contacted
- House of Representatives
- Senate
- Department of Health and Human Services
- Agency for Healthcare Research and Quality
- Centers for Medicare and Medicaid Services
- Health Resources and Services Administration

Check if None
 Department of Health and Human S
 Food and Drug Administration
 Centers for Disease Control and P

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
David N. Barnes	
Geri J. Colombaro	
Patricia J. Edington	
Edgar H. McCulloch III	
Debra L. Marks	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

Printed Name and Title _____

See Page 48

Form LD-2 (Rev.6/98)

1

International Business Machines Corporation (

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area MMM**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Paul R. Redifer		
..... Adrienne G. Rhone		
.....		
.....		
.....		
.....		
.....		
.....		
.....		

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues
H.R. 5025/S. 2806 Transportation, Treasury, and Independent Agencies Appropriations, 2005
Amtrak Funding

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

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patricia J. Edington	
Debra L. Marks	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

International Business Machines Corporation (

Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area RRR

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Steven W. Stewart
..... William H. Warner
.....
.....
.....
.....
.....
.....
.....

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- H.R. 4520 American Jobs Creation Act of 2004
- Executive Compensation
- H.R. 5025 Transportation/Treasury and Independent Agencies Appropriations Act, 2005
- Sanders Cash Balance Pension Amendment
- H.R. 4818 Consolidated Appropriations Act, FY 2005
- Sanders Cash Balance Pension Amendment

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

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
David N. Barnes	
Geri J. Colombaro	
Patricia J. Edington	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

International Business Machines Corporation (

Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area RET

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Adrienne G. Rhone		
..... Susan M. Siemietkowski		
.....		
.....		
.....		
.....		
.....		
.....		
.....		

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- H.R. 4614 Energy and Water Development Appropriations Act, 2005
- Defense and Civilian DOE
- Accelerated Strategic Computer Initiative (ASCI)
- Civilian DOE Computer Simulation Technology
- Physical Science Research & Development
- S. 2176 High-End Computing Revitalization Act of 2004

(See Attached Continuation Sheet)

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

- House of Representatives
- Senate
- Executive Office of the President
- Office of Science and Technology Policy
- Office of Management and Budget

Check if None

(See Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Yolanda L. Comedy	
Patricia J. Edington	
Kathleen N. Kingscott	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	

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

Check if None

Signature _____ Date _____

Printed Name and Title _____

See Page 48

Form LD-2 (Rev. 6/98)

1

International Business Machines Corporation (

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area SCI**

16. Specific lobbying issues

H.R. 4218 High Performance Computing Revitalization Act of 2004

High Performance Computing Research

H.R. 4818 Consolidated Appropriations Act, FY 2005

SIA Focus Center Research Program

National Science Foundation Funding

Life Sciences Research Funding

International Business Machines Corporation (

**Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area SCI**

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

Department of Commerce

Department of Energy

Defense Programs

Office of Science

Office of Advanced Scientific Computing Research

Department of Defense

National Security Agency

Department of the Navy

Defense Advanced Research Projects Agency

National Science Foundation

Directorate for Computers and Information Sciences and Engineering

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

15. General issue area code TAX (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

U.S.-Netherlands Tax Treaty

Repeal and Replacement for Foreign Sales Corporation - Extraterritorial Income Exclusion

Revision of Internal Revenue Code Subpart F on Deferral of Taxation

Repeal Limitation on Use of Foreign Tax Credits under the Corporate Alternative Minimum Tax
(See Attached Continuation Sheet)

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

House of Representatives

Senate

Executive Office of the President

Office of the United States Trade Representative

Department of Treasury

Internal Revenue Service

Check if None

Department of Commerce

Department of State

Securities and Exchange Commission

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patricia J. Edington	
Linda C. Evans	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
(See Attached Continuation Sheet)	

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

Check if None

Signature

Date

Printed Name and Title _____

See Page 48

Form LD-2 (Rev. 6/98)

Pa

International Business Machines Corporation (**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area TAX**

16. Specific lobbying issues

Treasury "Check-in-the-Box" Regulations
Taxation of Software (Section 18) Regulations
Taxation of Internet Transactions and Software
Fundamental Tax Reform
Internet Taxation and Business Activity Tax (BAT)
European Union Proposal for Taxation of Electronic Commerce, VAT Directive
European Union VAT on Outsourced Financial Services
Active Financing Exception to Subpart F
Research and Development Tax Credit Regulations
Research and Development Tax Credit Refinement
Stock Options and Payroll Taxes
 IRS Notice 2001-72
 IRS Notice 2001-73
 IRS Notice 2001-14
H.R. 4520 American Jobs Creation Act of 2004
 Excluding Employee Taxes from ESPPs (Employee Stock Purchase Plans) and ISOs
 (Incentive Stock Options)
 IRS Notice 2005-10 on Domestic Reinvestment Plans
Securities and Exchange Commission Implementation of P.L. 107-204 Sarbanes-Oxley Act
2002
Permanent Establishment (PE) Rules for Services in OECD
S. 1637 Jumpstart Our Business Strength (JOBS) Act
 Foreign Sales Corporation - Extraterritorial Income Exclusion

International Business Machines Corporation (

Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area TAX

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Timothy J. Sheehy
..... Susan M. Siemietkowski
.....
.....
.....
.....
.....
.....
.....

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- International Telecommunications
- Regulatory Treatment of Internet Service Providers
- International Charging Arrangements for Internet Services
- Electronic Commerce Trade Policy
- E-Rate
- Spectrum Allocation/Spectrum Management
- S. 2281/H.R. 4129 Voice Over Internet Protocol Regulatory Freedom Act of 2004

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

- House of Representatives
- Senate
- Executive Office of the President
- Office of the United States Trade Representative
- Department of Commerce
- Technology Administration
- National Telecommunications and Information Administration

(See Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Patricia J. Edington	
Debra L. Marks	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Timothy J. Sheehy	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

International Business Machines Corporation (

**Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area TEC**

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

Department of State
International Communications and Information Policy
Federal Communications Commission

International Business Machines Corporation (

Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area TEC

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Steven W. Stewart
..... Gregory W. Waddell
..... William H. Warner
.....
.....
.....
.....
.....
.....

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- Customs Classification
- Emerging Markets
- Electronic Commerce Trade Policy
- World Trade Organization (WTO) Work Program on E-Commerce
- WTO Negotiations Objectives Regarding E-Commerce
- WTO Trade Classification

(See Attached Continuation Sheet)

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

Check if None

- House of Representatives
- Senate
- Executive Office of the President
- Office of the United States Trade Representative
- National Economic Council
- Office of the Vice President

(See Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
David N. Barnes	
Patricia J. Edington	
Edward A. Gillespie	
Debra L. Marks	
Kimberly A. Marsho	
Vera A. Murray	
(See Attached Continuation Sheet)	

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

Check if None

See Addendum

Signature _____ Date _____

International Business Machines Corporation (**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area TRD**

16. Specific Lobbying Issues

Asia Pacific Economic Cooperation
 Ministerial and Heads of State Meetings
 Free Trade Area of the Americas
 Agenda and Issue Development
 GATT Government Procurement Agreement
 Membership Expansion
 Adherence to the GATT Government Procurement Agreement
 Trade Agreements Act
 WTO Transparency Agreement
 North America Free Trade Agreement (NAFTA)
 Implementation and Preservation
 U.S.-ANDEAN Free Trade Agreement
 U.S.-Bahrain Free Trade Agreement
 U.S.-Dominican Republic Central America Free Trade Agreement
 H.R. 4842/S. 2677 U.S.-Morocco Free Trade Agreement
 U.S.-New Zealand Free Trade Agreement
 U.S.-South Africa Customs Union Free Trade Agreement
 U.S.-Thailand Free Trade Agreement
 H.R. 4200/S. 2400 National Defense Authorization Act, 2005
 Export Controls Sections 1404, 1405, 1407
 Export Controls Regulations
 Deemed Export Regulations
 Microprocessor and Computer Export Regulations
 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
 OECD Guidelines for Multinational Enterprises
 China's WTO Accession Implementation
 China Standards-Related Issues, e.g., WAPI
 China Government Procurement
 S. 1637 Jumpstart Our Business Strength (JOBS) Act
 Schumer Amendment on China's Currency Manipulation
 S. 1637 Jumpstart Our Business Strength (JOBS) Act
 Dodd Anti-Offshoring Amendment

International Business Machines Corporation (

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area TRD**

16. Specific Lobbying Issues (Cont'd)

H.R. 4818 Consolidated Appropriations Act, FY 2005 Foreign Operations Bill (Sanders Amendment Prohibiting EXIM Loan Guarantees to Companies Incorporated Offshore)
H.R. 3888 To Prohibit Business Enterprises that Lay Off a Greater Percentage of their United States Workers than Workers in Other Countries from Receiving any Federal Assistance, and for Other Purposes
WTO Accession - Russia
WTO Accession - Saudi Arabia
Foreign Investment
S.Con.Res.393 Budget Resolution, 2005
Boxer Anti-Offshoring Amendment
H.R. 4090/S. 2157 Trade Adjustment Assistance Equity for Service Workers Act of 2004
S. 2090 Jobs for America Act of 2004
S. 2148 U.S.A. Jobs Protection Act of 2004
H.R. 3820/S. 2094 United States Workers Protection Act of 2004
H.R. 4392 Technical Retraining and Investment Now (TRAIN) Act of 2004
Iraq Reconstruction

International Business Machines Corporation (

**Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area TRD**

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

Department of Commerce
 Bureau of Industry and Security
 International Trade Administration
 Technology Administration
Department of Defense
 Acquisition, Technology, and Logistics
 Command, Control, Communications, and Intelligence
 Policy
 National Security Agency
Department of Justice
Department of Homeland Security
 Bureau of Customs and Border Protection
Department of State
 Bureau of Economic and Business Affairs
 Bureau of Political-Military Affairs
 Bureau of Nonproliferation
Department of the Treasury
 International Affairs
U.S. Agency for International Development
Export-Import Bank of the United States

International Business Machines Corporation (

Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area TRD

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Brian J. Raymond	
..... Paul G. Redifer	
..... Adrienne G. Rhone	
..... Susan M. Siemietkowski	
..... Steven W. Stewart	
..... Susan C. Tuttle	
..... Marcus P. Williams	X
.....	
.....	

Lobbying Report Addendum for Item 19
Issue Areas TAX and TRD

19. For registrants identifying foreign entities in the Lobbying Registration (Form LD-1, line 14) or any updates: Int of each such foreign entity in the specific lobbying issues listed on line 16 above

Regarding Lines 14(a) and 14(b) of Form LD-1: None. Regarding Line 14(c) of Form LD-1, the term “direct interest” is not defined in the statute and its meaning remains ambiguous. IBM believes that its foreign subsidiaries have only an indirect and derivative interest in the lobbying activities covered by this Addendum. IBM’s foreign subsidiaries do not have the predominant interest in the matters for which IBM has engaged in lobbying activities since the parent company initiates, directs, finances and controls such activities and does not act merely as an agent for one or more of its subsidiaries. However, because the interpretation of “direct interest” remains uncertain we include a list of the major worldwide non-U.S. subsidiaries of the company. Depending on the meaning finally given to the statutory terms, one or more of these subsidiaries might be viewed as having a direct interest in one or more of the activities covered by this Addendum.

IBM World Trade Subsidiaries

IBM Argentina Holdings B.V.	IBM Korea, Inc.
IBM Australia Limited	IBM de Mexico, S.A.
IBM Oesterreich Internationale Bueromaschinen Gesellschaft m.b.H.	IBM Nederland N.V.
International Business Machines of Belgium S.A.	IBM New Zealand Limited
IBM de Bolivia, S.A.	International Business Machines A/S (Norway)
IBM Brasil-Industria, Maquinas e Servicos Limitada	IBM del Peru, S.A.
IBM Bulgaria Ltd.	IBM Philippines, Inc.
IBM Canada Limited - IBM Canada Limitee	IBM Polska Sp.z.o.o.
IBM de Chile, S.A.C.	Companhia IBM Portuguesa, S.A.
IBM China Company Ltd.	IBM Romania Srl
IBM de Colombia, S.A.	IBM East Europe/Asia Ltd.
IBM Croatia Ltd.	IBM Singapore Pte. Ltd.
IBM Ceska Republika spol. s.r.o. (Czech Republic)	IBM Slovensko spol.s.r.o. (Slovak Republic)
IBM Danmark A/S	IBM Slovenija d.o.o. (Slovenia)
IBM Middle East FZE	IBM South Africa (Pty) Ltd.
IBM del Ecuador, C.A.	International Business Machines, S.A. (Spain)
Oy International Business Machines AB (Finland)	IBM Svenska Aktiebolag
Compagnie IBM France, S.A.	IBM(Schweiz)-IBM (Suisse)-IBM(Svizzera)- IBM (Switzerland)
IBM Deutschland GmbH	IBM Taiwan Holdings B.V.
IBM Hellas Information Handling Systems S.A. (Greece)	IBM Thailand Co. Ltd.
International Business Machines Corporation Magyarorszagi Kft (Hungary)	IBM (International Business Machines) Turk Lim Sirketi
IBM Ireland Limited	IBM United Kingdom Holdings Limited
IBM Israel Limited	IBM del Uruguay, S.A.
IBM India Limited	IBM de Venezuela, S.A.
IBM Italia S.P.A.	
IBM Japan, Ltd.	

Registrant Name IBM Client Name Self

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

20. Client new address

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

City

State/Zip (or Country)

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

LOBBYIST UPDATE

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

Susan M. Siemietkowski

Gregory W. Waddell

ISSUE UPDATE

24. General lobbying issues previously reported that no longer pertain

BAN

AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Name	Address	Principal Place of B (city and state or c

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

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

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



2/14/15

Signature *Adrienne G. Rhone* Date 2/11/05

Printed Name and Title Adrienne G. Rhone, Director of Government Relations

Form LD-2 (Rev. 6/98)

Page