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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, NW			
3. Principal Place of Business (if different from line 2)			
City: Washington		State/Zip (or Country) DC 20	
4. Contact Name David Marchick	Telephone (202) 6625527	Email (optional) dmarchick@cov.com	5. Senate ID #
7. Client Name <input type="checkbox"/> Self Philippine Long Distance Telephone Company			6. House ID #

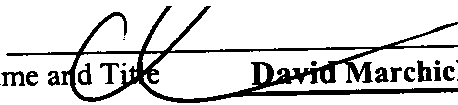
TYPE OF REPORT 8. Year 2004 Midyear (January 1-June 30) ☐ OR Year End (July 1-December)

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 Activities ☐

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 checked="" 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 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 checked="" type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> ⇒ \$ _____ Expenses (nearest \$)</p> <p>14. REPORTING METHOD. Check box expense accounting method. See instruction description of options.</p> <p><input checked="" type="checkbox"/> Method A. Reporting amounts using L definitions only</p> <p><input type="checkbox"/> Method B. Reporting amounts under s 6033(b)(8) of the Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under 1 Internal Revenue Code</p>

Signature  Date February 14, 2005
Printed Name and Title David Marchick

Registrant Name

Covington & Burling

Client Name

Philippine Long Distance Tele
Company

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 code, provide information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

US - Philippine telecommunications issues

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

☐ Check if None

USTR, Department of State

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

Name

Covered Official Position (if applicable)

David Marchick

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

☐ Check if None

Signature

Printed Name and Title



David Marchick

Date

February 14, 2005

Registrant Name Covington & BurlingClient Name Philippine Long Distance Tele
Company**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 UPDATE23. Name of each previously reported individual who is **no longer** expected to act as a lobbyist for the cl**ISSUE UPDATE**24. General lobbying issues previously reported that **no longer** pertain**AFFILIATED ORGANIZATIONS**

25. Add the following affiliated organization(s)

Name	Address	Principal Place of Bus (city and state or cou


26. Name of each previously reported organization that is **no longer** affiliated with the registrant or clie**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	C p c
PLDT		Philippines	100%	1

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

Signature



Date February 14, 2005

Printed Name and Title

David Marchick