

## LOBBYING REPORT

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

1. Registrant Name:

**INTL BUSINESS MACHINES CORP**

2. Address:

1301 K STREET, NW, WASHINGTON, DC 20005-3307

3. Principal place of business (if different from line 2):

City: ARMONK State/Zip(or Country): NY 10504

4. Contact Name: LISA PALLUCONI

Telephone: 2025154381

E-mail (optional): PALLUCON@US.IBM.COM

Senate ID #: 19877-12

House ID #:

7. Client Name:  Self

## TYPE OF REPORT

8. Year 2007 Midyear (January 1 - June 30):  **OR** Year End (July 1 - December 31):

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 Activity:

## INCOME OR EXPENSES

Complete Either Line 12 **OR** Line 13

### 12. Lobbying Firms

**INCOME** relating to lobbying activities for this reporting period was:

Less than \$10,000:

\$10,000 or more:  => Income (nearest \$20,000): \_\_\_\_\_

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).

### 13. Organizations

**EXPENSES** relating to lobbying activities for this reporting period were:

Less than \$10,000:

\$10,000 or more:  => Expenses (nearest \$20,000): 3,860,000.00

### 14. Reporting Method.

Check box to indicate expense accounting method. See instructions for description of options.

- Method A.** Reporting amounts using LDA definitions only  
 **Method B.** Reporting amounts under section 6033(b)(8) of the Internal Revenue Code  
 **Method C.** Reporting amounts under section 162(e) of the Internal Revenue Code

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

## 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 for each code, provide 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, and Government/Private Sector Research and Development Programs. Please see General Lobbying Area Codes: DEF, GOV, HCR, HOM, & SCI for the report on these issues.

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

Centers For Disease Control & Prevention (CDC)  
Commerce, Dept of (DOC)  
Defense, Dept of (DOD)  
Education, Dept of  
Energy, Dept of  
Executive Office of the President (EOP)  
Food & Drug Administration (FDA)  
General Services Administration (GSA)  
HOUSE OF REPRESENTATIVES  
Health & Human Services, Dept of (HHS)  
Homeland Security, Dept of (DHS)  
Office of Management & Budget (OMB)  
Office of Science & Technology Policy (OSTP)  
SENATE

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

Name: BARNES, DAVID N  
Covered Official Position (if applicable): N/A  
Name: CAINE, CHRISTOPHER G.  
Covered Official Position (if applicable): N/A  
Name: DODD, CHRISTINE  
Covered Official Position (if applicable): N/A  
Name: EDINGTON, PATRICIA J.  
Covered Official Position (if applicable): N/A  
Name: GILLESPIE, EDWARD A.  
Covered Official Position (if applicable): N/A  
Name: GRAY, DANA  
Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER  
Name: MARSHO, KIMBERLY M.  
Covered Official Position (if applicable): N/A  
Name: MCCULLOCH, EDGAR H. III  
Covered Official Position (if applicable): N/A  
Name: MUSTAIN, CHRISTOPHER J.  
Covered Official Position (if applicable): N/A  
Name: PHELPS, LAUREN  
Covered Official Position (if applicable): N/A  
Name: RHONE, ADRIENNE G.  
Covered Official Position (if applicable): N/A  
Name: SINGER, MEREDITH  
Covered Official Position (if applicable): N/A  
Name: SOUTHWORTH, GEORGE  
Covered Official Position (if applicable): N/A  
Name: STEWART, STEVEN W.  
Covered Official Position (if applicable): N/A  
Name: TUTTLE, SUSAN C.  
Covered Official Position (if applicable): N/A  
Name: WILLIAMS, MARCUS P.  
Covered Official Position (if applicable): N/A

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



Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

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

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

16. Specific lobbying issues:

S. 495 Personal Data Privacy & Security Act of 2007 S. 239 Notification of Risk to Personal Data Act of 2007 S. 1178 Identity Theft Prevention Act S. 1260 Data Security Act of 2007

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

Commerce, Dept of (DOC)  
Federal Trade Commission (FTC)  
HOUSE OF REPRESENTATIVES  
SENATE

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: IGNASZEWSKI, KATIE

Covered Official Position (if applicable): N/A

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SHEEHY, TIMOTHY J.

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

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

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

16. Specific lobbying issues:

Patent Reform S. 1145/H.R. 1908 Patent Reform Act of 2007 Post-Patent-Grant Review

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

Commerce, Dept of (DOC)  
Defense, Dept of (DOD)  
Federal Trade Commission (FTC)  
HOUSE OF REPRESENTATIVES  
Justice, Dept of (DOJ)  
Patent & Trademark Office (PTO)  
SENATE  
State, Dept of (DOS)  
U.S. Trade Representative (USTR)

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SHEEHY, TIMOTHY J.

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

Name: WILLIAMS, MARCUS P.

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

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

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

16. Specific lobbying issues:

H.R. 3222 Department of Defense Appropriations Act, FY 2007 H.R. 1585/S. 1547 National Defense Authorization Act, FY 2007  
Enterprise Resource Planning (Navy) eArmy University

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

Defense, Dept of (DOD)  
HOUSE OF REPRESENTATIVES  
SENATE

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GILLESPIE, EDWARD A.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

Name: WILLIAMS, MARCUS P.

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

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

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

16. Specific lobbying issues:

Educational Standards

Accessibility Workforce Development Innovation (Talent)

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

Commerce, Dept of (DOC)  
Education, Dept of  
HOUSE OF REPRESENTATIVES  
Labor, Dept of (DOL)  
Nat Science Foundation (NSF)  
SENATE

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: EDINGTON, PATRICIA J.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: MUSTAIN, CHRISTOPHER J.

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

Name: TUTTLE, SUSAN C.

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

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

15. General issue area code: ENG (one per page)

16. Specific lobbying issues:

Smart Power Grid H.R. 6 Clean Energy Act of 2007 H.R. 2641/S. 1751 Energy and Water Development and Related Agencies Appropriations Act, 2008 Roadrunner Project

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

Energy, Dept of  
Environmental Protection Agency (EPA)  
Federal Energy Regulatory Commission (FERC)  
HOUSE OF REPRESENTATIVES  
Office of Science & Technology Policy (OSTP)  
SENATE

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: ORILEY, MARK

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: RHONE, ADRIENNE G.

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

Name: ZIVANOVIC-SMITH, MARIJA

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

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

15. General issue area code: ENV (one per page)

16. Specific lobbying issues:

Product Take-Back Legislation Draft "Energy Star Program"

17. House(s) of Congress and Federal agencies contacted:  
Environmental Protection Agency (EPA)

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PERRY, EDUMND F.

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

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

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

16. Specific lobbying issues:

H.R. 1585/S. 1547 National Defense Authorization Act, 2007 Competitive Sourcing Provisions

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

Defense, Dept of (DOD)  
Executive Office of the President (EOP)  
General Services Administration (GSA)  
HOUSE OF REPRESENTATIVES  
Office of Management & Budget (OMB)  
SENATE

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

Name: WILLIAMS, MARCUS P.

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

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

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

16. Specific lobbying issues:

H.R. 3176 State & Children Health Insurance Program - 2007 reauthorization (SCHIP) S. 1456 Electronic Personal Health Records (PHRS) for Member of the Federal Employee Health Benefit Plans H.R. 493/S. 358 Genetic Information Nondiscrimination Act of 2007 S. 558 Mental Health Parity Act of 2007

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

Centers For Disease Control & Prevention (CDC)  
Centers For Medicare and Medicaid Services (CMS)  
Defense, Dept of (DOD)  
Executive Office of the President (EOP)  
Food & Drug Administration (FDA)  
HOUSE OF REPRESENTATIVES  
Health & Human Services, Dept of (HHS)  
Health Resources & Services Administration (HRSA)  
Natl Institutes of Health (NIH)  
SENATE  
White House Office

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

Name: BARNES, DAVID N  
Covered Official Position (if applicable): N/A  
Name: CAINE, CHRISTOPHER G.  
Covered Official Position (if applicable): N/A  
Name: DOOD, CHRISTINE  
Covered Official Position (if applicable): N/A  
Name: GRAY, DANA  
Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER  
Name: MCCULLOCH, EDGAR H. III  
Covered Official Position (if applicable): N/A  
Name: PHELPS, LAUREN  
Covered Official Position (if applicable): N/A  
Name: SINGER, MEREDITH  
Covered Official Position (if applicable): N/A  
Name: SOUTHWORTH, GEORGE  
Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

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

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

16. Specific lobbying issues:

Supply Chain Security and Air Cargo Security H.R. 1/S. 4 Implementing Provisions of the 9/11 Commission Act

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

HOUSE OF REPRESENTATIVES

Homeland Security, Dept of (DHS)

SENATE

Transportation Security Administration (TSA)

U.S. Customs & Border Protection

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MARSHO, KIMBERLY M.

Covered Official Position (if applicable): N/A

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

Name: STEWART, STEVEN W.

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

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

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

16. Specific lobbying issues:

H.R. 3176 SCHIP Reauthorization and Reform Act of 2007 H.R. 3162 Children's Health and Medicare Protection (CHAMP) Act of 2007

17. House(s) of Congress and Federal agencies contacted: **None**

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

Name: BARNES, DAVID N

Covered Official Position (if applicable): N/A

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: DOOD, CHRISTINE

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

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

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

16. Specific lobbying issues:

S. 708 Health Care and Training for Older Workers Act Deferred Compensation Provisions (proposed) to be used to raise revenue for other legislation (pending)

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

HOUSE OF REPRESENTATIVES

Labor, Dept of (DOL)

SENATE

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

Name: BARNES, DAVID N

Covered Official Position (if applicable): N/A

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: DOOD, CHRISTINE

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

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

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

16. Specific lobbying issues:

H.R. 362 10,000 Teachers, 10 Million Minds Science and Math Scholarship Act H.R. 363 Sowing the Seeds Through Science and Engineering Research Act H.R. 1867 National Science Foundation Authorization Act of 2007 H.R. 1868 Technology Innovation and Manufacturing Stimulation Act of 2007

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

Commerce, Dept of (DOC)  
Education, Dept of  
HOUSE OF REPRESENTATIVES  
Natl Science Foundation (NSF)  
SENATE

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

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: EDINGTON, PATRICIA J.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: MUSTAIN, CHRISTOPHER J.

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

Name: TUTTLE, SUSAN C.

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

### 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 for each code, provide 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 Taiwan-U.S. Tax Agreement

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

Commerce, Dept of (DOC)  
Council of Economic Advisers (CEA)  
Executive Office of the President (EOP)  
HOUSE OF REPRESENTATIVES  
Internal Revenue Service (IRS)  
SENATE  
State, Dept of (DOS)  
Treasury, Dept of  
U.S. Trade Representative (USTR)

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

Name: CAINE, CHRISTOPHER G.  
Covered Official Position (if applicable): N/A  
Name: EVANS, LINDA C.  
Covered Official Position (if applicable): N/A  
Name: GRAY, DANA  
Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER  
Name: MCCULLOCH, EDGAR H. III  
Covered Official Position (if applicable): N/A  
Name: PERRY, EDUMND F.  
Covered Official Position (if applicable): N/A  
Name: PHELPS, LAUREN  
Covered Official Position (if applicable): N/A  
Name: SINGER, MEREDITH  
Covered Official Position (if applicable): N/A  
Name: SOUTHWORTH, GEORGE  
Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

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

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

16. Specific lobbying issues:

International Telecommunications Special Access Rate Reform Regulatory Treatment of Internet Service Providers Spectrum Allocation/Spectrum Management Telecommunications Reform

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

Federal Communications Commission (FCC)  
HOUSE OF REPRESENTATIVES  
SENATE

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

Name: BRUNER, CHERYL L.

Covered Official Position (if applicable): N/A

Name: CAINE, CHRISTOPHER G.

Covered Official Position (if applicable): N/A

Name: GRAY, DANA

Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER

Name: MCCULLOCH, EDGAR H. III

Covered Official Position (if applicable): N/A

Name: PHELPS, LAUREN

Covered Official Position (if applicable): N/A

Name: SINGER, MEREDITH

Covered Official Position (if applicable): N/A

Name: SOUTHWORTH, GEORGE

Covered Official Position (if applicable): N/A

Name: STEWART, STEVEN W.

Covered Official Position (if applicable): N/A

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

Registrant Name: INTL BUSINESS MACHINES CORP Client Name: Self

## 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 for each code, provide 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 Asia Pacific Economic Cooperation Ministerial and Heads of State Meetings

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

Commerce, Dept of (DOC)  
Executive Office of the President (EOP)  
HOUSE OF REPRESENTATIVES  
Homeland Security, Dept of (DHS)  
Natl Economic Council (NEC)  
Natl Security Council (NSC)  
SENATE  
State, Dept of (DOS)  
Treasury, Dept of  
U.S. Customs & Border Protection  
U.S. Trade Representative (USTR)  
Vice President of the U.S.

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

Name: BRUNER, CHERYL L.  
Covered Official Position (if applicable): N/A  
Name: CAINE, CHRISTOPHER G.  
Covered Official Position (if applicable): N/A  
Name: GILLESPIE, EDWARD A.  
Covered Official Position (if applicable): N/A  
Name: GRAY, DANA  
Covered Official Position (if applicable): SENIOR POLICY ADVISOR, REP. TAUSCHER  
Name: MARKS, DEBRA L.  
Covered Official Position (if applicable): N/A  
Name: MARSHO, KIMBERLY M.  
Covered Official Position (if applicable): N/A  
Name: MCCULLOCH, EDGAR H. III  
Covered Official Position (if applicable): N/A  
Name: PHELPS, LAUREN  
Covered Official Position (if applicable): N/A  
Name: SINGER, MEREDITH  
Covered Official Position (if applicable): N/A  
Name: SOUTHWORTH, GEORGE  
Covered Official Position (if applicable): N/A  
Name: STEWART, STEVEN W.  
Covered Official Position (if applicable): N/A

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

Signature: ON FILE Date: Feb 18, 2008

Printed Name and Title: CHRISTOPHER G. CAINE, VICE PRE -

**Information Update Page:**

**Complete ONLY where registration information has changed.**

**LOBBYIST UPDATE**

**23. Name of each previously reported individual who is NO LONGER expected to act as a lobbyist for the client**

Name: ZIVANOVIC-SMITH, MARIJA

**ISSUE UPDATE**

**24. General lobbying issues previously reported that NO LONGER pertain**

**AFFILIATED ORGANIZATIONS**

**25. Add the following organization(s)**

**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**

**28. Name of each previously reported foreign entity the NO LONGER owns, OR controls, OR is affiliated with the registrant, client or affiliated organization**

Signature: ON FILE Date: Feb 18, 2008

Printed Name and Title: -