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# LOBBYING REPORT

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

1. Registrant Name <b>Covington &amp; Burling</b>			
2. Address <input type="checkbox"/> Check if different than previously reported. <b>1201 Pennsylvania Avenue, N.W.</b>			
3. Principal Place of Business (if different from line 2)			
City: <b>Washington</b>		State/Zip (or Country) <b>D.C. 20</b>	
4. Contact Name <b>Gerard J. Waldron</b>	Telephone <b>(202) 662-5360</b>	Email (optional) <b>gwaldron@cov.com</b>	5. Senate ID # <b>11195-1115</b>
7. Client Name <input type="checkbox"/> Self <b>American Automobile Association</b>			6. House ID # <b>31827080</b>

TYPE OF REPORT 8. Year 2005 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 1/1/05 11. No Lobbying Act ☐

## INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

<p><b>12. Lobbying Firms</b></p> <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><b>13. Organizations</b></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><b>14. REPORTING METHOD.</b> Check box to expense accounting method. See instruction description of options.</p> <p><input type="checkbox"/> Method A. Reporting amounts using L.D. definitions only</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under 162 Internal Revenue Code</p>
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Signature

Date May 19, 2005

Printed Name and Title

**Gerard J. Waldron**

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DC: 1755876-2

Registrant Name Covington & Burling Client Name American Automobile Associati

**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 AUT TRA (one per page)

16. Specific lobbying issues

Highway safety and consumer safety - Oversight of highway safety and consumer access to safety devices and no specific legislative proposals.

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

☐ Check if None

U.S. House of Representatives

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

Name

Covered Official Position (if applicable)

Geard J. Waldron

Partner

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

☒ Check if None

Signature



Date

May 19, 2005

Printed Name and Title

Geard J. Waldron



Registrant Name Covington & BurlingClient Name American Automobile Associat**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 cli**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 Busi (city and state or coun

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	Ow per clit

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

Signature



Date

May 19, 2005

Printed Name and Title

Gerald J. Waldman

