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LOBBYING REPORT

05 FEB 14 PM 4:27

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

1. Registrant Name
Covington & Burling

2. Address Check if different than previously reported.
1201 Pennsylvania Avenue, N.W.

3. Principal Place of Business (if different from line 2)
City: **Washington** State/Zip (or Country) **DC/20**

4. Contact Name Roderick A. DeArment	Telephone 202-662-5900	Email (optional) rdearment@cov.com	5. Senate ID # 11195-75
7. Client Name <input type="checkbox"/> Self American Watch Association			6. House ID # 31827004

TYPE OF REPORT 8. Year 2004 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 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 type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> ⇨ \$ _____ Expenses (nearest \$20,000)</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 LI 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 section 162(e) of the Internal Revenue Code</p>



Signature  Date February 11, 2005
Printed Name and Title Roderick A. DeArment, Partner

DC: 599066-6

Registrant Name Covington & Burling

Client Name American Watch Association

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in 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

**Worldwide reduction in watch tariffs
Amendments to United States Insular Possession Program
Tariff Simplification.
Virgin Islands drawback
NAFTA watch tariff
Country of origin rules**

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

**House of Representatives
United States Senate
United States Trade Representative**

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

Name Covered Official Position (if applicable)

Roderick A. DeArment

David Grace

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

Signature

Date

February 11 2005

Signature  Date FEBRUARY 11, 2003
Printed Name and Title Roderick A. DeArment, Partner