

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
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# LOBBYING REPORT

SECRETARY OF THE SENATE

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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 2003 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><b>INCOME</b> 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>EXPENSES</b> 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 indicate expense accounting method. See instructions for description of options.</p> <p><input type="checkbox"/> <b>Method A.</b> Reporting amounts using LD definitions only</p> <p><input type="checkbox"/> <b>Method B.</b> Reporting amounts under section 6033(b)(8) of the Internal Revenue Code</p> <p><input type="checkbox"/> <b>Method C.</b> Reporting amounts under section 16 of the Internal Revenue Code</p>

Signature Gerard J. Waldron Date February 17, 2004  
Printed Name and Title Gerard J. Waldron

Registrant Name Covington & Burling Client Name American Automobile Association

**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 data - 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)

**Gerard J. Waldron**

**Partner**

**Jack Schenendorf**

**Special Counsel**

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

☒ Check if None

Signature Gerard J. Waldron Date February 17, 2004  
Printed Name and Title Gerard J. Waldron

Registrant Name

Covington & Burling

Client Name

American Automobile Associati**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)

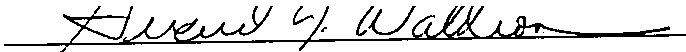
Name	Address	Principal Place of Bus (city and state or cour

26. Name of each previously reported organization that is **no longer** affiliated with the registrant or clien**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	O pe cl

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

Signature  Date February 17, 2004  
Printed Name and Title Gerard J. Waldron