



SECRETARY OF THE SENATE
1301 K Street
Washington, DC 20005-3307
04 FEB 17 PM 1:40

February 17, 2004

VIA HAND DELIVERY

Timothy W. Jenkins, Esq.
O'Connor & Hannan, L.L.P.
1666 K Street, N.W. - Suite 500
Washington, D.C. 20006-2803

RE: Second Half 2003 Lobbying Disclosure Act Report

Dear Tim:

I am enclosing with this letter two originals and two cc of IBM's LD-2, Lobbying Report, for filing today, February 17 2004.

Please file one original with the Clerk of the House, one original with the Secretary of the Senate, and have each copy receipt-stamped by the Clerk's office and the Secretary's office. I would appreciate your returning the receipt-stamped copies to me.

Best regards.

Sincerely,

A handwritten signature in black ink that reads 'Marc'.

Marcus P. Williams
Counsel
Governmental Programs

MPW/ral

Enclosures

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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SECRETARY OF THE

04 FEB 17 PM

LOBBYING REPORT

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

1. Registrant Name International Business Machines Corporation (IBM)			
2. Address <input type="checkbox"/> Check if different than previously reported 1301 K Street, N.W., Washington, D.C. 20005-3307			
3. Principal Place of Business (if different from line 2) City: Armonk State/Zip (or Country) New York 10504			
4. Contact Name Marcus P. Williams	Telephone (202) 515-5522	E-mail (optional) marcwill@us.ibm.com	5. Senate ID # 19877-
7. Client Name <input checked="" type="checkbox"/> Self			6. House ID # 311230

TYPE OF REPORT 8. Year 2003 Midyear (January 1-June 30) OR Year End (July 1-D
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 Lobbyi

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

<p align="center">12. Lobbying Firms</p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$10,000 <input 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 from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).</p>	<p align="center">13. Organizations</p> <p>EXPENSES relating to lobbying activities for this period were:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input checked="" type="checkbox"/> ⇒ \$ <u>3,540,000</u> Expenses (nearest \$2</p> <p>14. REPORTING METHOD. Check box to indicate accounting method. See instructions for description</p> <p><input checked="" type="checkbox"/> Method A. Reporting amounts using LDA def</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6 Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 1 Internal Revenue Code</p>
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Signature _____

Printed Name and Title _____ See Page 46

LD-2 (REV. 6/98)

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each cot information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues
H.R. 5414/S. 1334 Check Truncation Act of 2003
Check Imaging and Digital Processing

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

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Linda C. Evans	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Timothy J. Sheehy	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

International Business Machines Corporation (

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area BAN**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
Susan M. Siemietkowski		
Gregory W. Waddell		

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code 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, Patent and Trademark Office, and Government/Private Sector Research and Development Programs.

Please see General Lobbying Area Codes CPT, DEF, HOM, RRR, and SCI for the report on these issues.

17. House(s) of Congress and Federal agencies contacted Check if None
See General Lobbying Issue Area Codes CPT, DEF, HOM, RRR, and SCI

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

Name	Covered Official Position (if applicable)
See General Lobbying Issue Area Codes CPT, DEF, HOM, RRR and SCI	

19. Interest of each foreign entity in the specific issues listed on line 16 above Check if None
See General Lobbying Issue Area Codes CPT, DEF, HOM, RRR and SCI

Signature _____ Date _____

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each cot information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- Cybersecurity Research and Development
- Freedom of Information Act (FOIA)
 - Critical Infrastructure Information Sharing
- Government Evaluation/Certification of Security Products
- National Strategy to Secure Cyberspace
- Security-Related Standards
- Corporate Governance - Security

(See Attached Continuation Sheet)

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

Check if None

- House of Representatives
- Senate
- Executive Office of the President
 - Homeland Security Council
 - National Security Council
 - Office of Cyberspace Security
 - Office of Management and Budget

(See Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Timothy B. Hackman	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
(See Attached Continuation Sheet)	

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

Check if None

Signature

Date

International Business Machines Corporation ()

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area CPI**

16. Specific lobbying issues

Security Technology Mandates

Structure of Department of Homeland Security

H.R. 1416 Homeland Security Technical Corrections Act of 2003

S. 1350 Notification of Risk to Personal Data Act

PL 107-296, Title 8, Subtitle G, Support Antiterrorism by Fostering Effective Technologies Act

Risk Sharing for Homeland Security Technology and Services

International Business Machines Corporation (

**Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area CPI**

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

Department of Commerce
Critical Infrastructure Assurance Office
National Institute of Standards
Department of Homeland Security
Office of General Counsel
Science and Technology Directorate
Information Analysis and Infrastructure Protection Directorate
National Cyber Security Division

International Business Machines Corporation (

Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area CPI

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Timothy J. Sheehy
..... Susan M. Siemietkowski
..... Gregory W. Waddell
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.....

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each cot information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues
H.R. 1636 Consumer Privacy Protection Act

17. House(s) of Congress and Federal agencies contacted Check if None
House of Representatives
Senate
Department of Commerce
International Trade Administration
Federal Trade Commission

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Kathleen N. Kingscott	
Christopher J. Mustain	
Edmund F. Perry	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Signature

Date

Printed Name and Title

See Page 46

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International Business Machines Corporation (

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area CSP**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Paul R. Redifer		
..... Adrienne G. Rhone		
..... Timothy J. Sheehy		
..... Susan S. Siemietkowski		
..... Gregory W. Waddell		
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Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each cod information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- Business Methods Patents
- S. 1621 Consumers, Schools, and Libraries Digital Rights Management Awareness Act of 2003
- Electronically-filed Patent Applications
- Open Source Software
- Open Source Use in the Public Sector
- Patent and Trademark Office Funding
- Patent Fee Withholding

(See Attached Continuation Sheet)

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

- House of Representatives
- Senate
- Executive Office of the President
- Office of Management and Budget
- Office of the United States Trade Representative

Check if None

- Department of Commerce
- Patent and Trademark Office
- Department of Defense
- Department of State

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Cheryl L. Bruner	
Timothy B. Hackman	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
(See Attached Continuation Sheet)	

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

Check if None

Signature _____ Date _____

International Business Machines Corporation (

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area CPT**

16. Specific lobbying issues

Patent and Trademark Office Strategic Plan

Patent Reexamination

Software Patents

Transition to Digital Television Draft Legislation

H.R. 107 Digital Media Consumer Rights Act of 2003

H.R. 2799/S. 1585 Departments of Commerce, Justice, and State, the Judiciary, and Related
Agencies Appropriations Act, 2004

Patent and Trademark Office Funding

H.R. 909 Legislation to Direct the PTO Director to Adjust Patent Fees

H.R. 1066 Benefit Authors without Limiting Advancement or Net Consumer Expectations
(BALANCE) Act of 2003

H.R. 1561 United States Patent and Trademark Fee Modernization Act of 2003

H.R. 2517 Piracy Deterrence and Education Act of 2003

S. 692 Digital Consumer Right to Know Act

International Business Machines Corporation (I

Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area CPT

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
Adrienne G. Rhone		
Susan M. Siemietkowski		
Timothy J. Sheehy		
Gregory W. Waddell		

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- H.R. 1588/S. 1050 National Defense Authorization Act for Fiscal Year 2004
 - Science and Technology Research and Development
 - Enterprise Resource Planning
 - Defense Integrated Military Human Resources System
 - eArmy University
- H.R. 2658/S. 1382 Department of Defense Appropriations Act, 2004
 - Science and Technology Research and Development
 - eArmy University

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

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Kathleen N. Kingscott	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Susan M. Siemietkowski	
(See Attached Continuation Sheet)	

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

Signature

Date

International Business Machines Corporation (

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area DEF**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Steven W. Stewart
..... William H. Warner
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Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each cot information as requested. Attach additional page(s) as needed.

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

- 16. Specific lobbying issues
 - Educational Standards
 - Workforce Development

- 17. House(s) of Congress and Federal agencies contacted
 - House of Representatives
 - Senate
 - Executive Office of the President
 - Domestic Policy Council
 - National Economic Council
 - Office of Science and Technology Policy
 - Department of Education

Check if None
Department of Commerce

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Kathleen N. Kingscott	
Edgar H. McCulloch III	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Susan M. Siemietkowski	

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

Signature _____ Date _____

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. **Using a separate page for each code** information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- H.R. 1588/S. 1050 National Defense Authorization Act for FY2004
 - Definition of Commercial Service/Item
 - Use of other than Firm Fixed Price Contracts for Acquisition of Commercial Services
 - Application of the Buy America Act to Defense Acquisitions
- H.R. 2989/S. 1589 Transportation, Treasury, and Independent Agencies Appropriations Act, 2004
 - Exemption of IT Products from the Provisions of the Trade Agreements Act
 - Competitive Sourcing Provisions

(See Attached Continuation Sheet)

17. House(s) of Congress and Federal agencies contacted
- House of Representatives
 - Senate
 - Executive Office of the President
 - Office of the United States Trade Representative
 - Office of Management and Budget
 - Office of Federal Procurement Policy
 - General Services Administration
 - The Access Board

- Check if None
- Department of Defense
- Office of Procurement Policy

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Kathleen N. Kingscott	
Bruce E. Leinster	
Edgar H. McCulloch III	
Edmund F. Perry	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Signature

Date

Printed Name and Title

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International Business Machines Corporation (

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area GOV**

16. Specific lobbying issues

H.R. 1837 Services Acquisition Reform Act of 2003
Accessibility - Section 508 Requirements

International Business Machines Corporation (

Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area GOV

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Paul R. Redifer
..... Adrienne G. Rhone
..... Susan M. Siemietkowski
..... Steven W. Stewart
..... William H. Warner
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.....

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- H.R. 2555 Department of Homeland Security Appropriations Act, 2004
- Customs Modernization
- Flood Map Modernization
- U.S. VISIT (United States Visitor and Immigration Status Indicator Technology)
- CAP WIN (Capitol Wireless Integrated Network)

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

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Edmund F. Perry	
Brian J. Raymond	
Paul Redifer	
Adrienne G. Rhone	
(See Attached Continuation Sheet)	

19. Interest of each foreign entity in the specific issues listed on line 16 above Check if None
 See Addendum

Signature _____ Date _____

International Business Machines Corporation ()

Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area HOM

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Paul R. Redifer
..... Adrienne G. Rhone
..... Susan M. Siemietkowski
..... Steven W. Stewart
..... William H. Warner
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Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each cot information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

Inside Sales Draft Legislation

International Air Transport Association (IATA)

Application for Antitrust Exemption Regarding Low Density Cargo

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

House of Representatives

Senate

Department of Transportation

Department of Justice

Department of Commerce

Technology Administration

Federal Trade Commission

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
David N. Barnes	
Geri J. Colombaro	
Kimberly A. Marsho	
Edmund F. Perry	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Signature

Date

Printed Name and Title _____

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International Business Machines Corporation (

Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area LBR

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Paul R. Redifer
..... Adrienne G. Rhone
..... Susan M. Siemietkowski
..... Steven W. Stewart
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Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- H.R. 1 Medicare Prescription Drug, Improvement, and Modernization Act of 2003
- S. 1 Prescription Drug and Medicare Improvement Act of 2003

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

- House of Representatives
- Senate
- Department of Health and Human Services
- Agency for Healthcare Research and Quality
- Centers for Medicare and Medicaid Services
- Health Resources and Services Administration

- Check if None
- Department of Health and Human Services
- Food and Drug Administration
- Centers for Disease Control

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
David N. Barnes	
Geri J. Colombaro	
Kathleen N. Kingscott	
Edgar H. McCulloch III	
Edmund F. Perry	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Check if None

Signature

Date

Printed Name and Title

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International Business Machines Corporation (

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area MMM**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Paul R. Redifer
..... Adrienne G. Rhone
..... Susan M. Siemietkowski
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Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- H.R. 2989/S. 1589 Transportation, Treasury, and Independent Agencies Appropriations, 2004
- Amtrak Funding
- H.R. 2572 Amtrak Reauthorization Act of 2003
- Transportation Equity Act
- Amtrak

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

Check if None

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Susan M. Siemietkowski	
Steven W. Stewart	
William H. Warner	

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

Check if None

Signature

Date

Printed Name and Title

See Page 46

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Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

H.R. 2/S. 2 Jobs and Growth Tax Relief Reconciliation Act of 2003

Executive Compensation

H.R. 1000 Pension Security Act

Miller Cash Balance Amendments

H.R. 1677/S.825 Pension Benefits Protection Act of 2003

H.R. 1776 Pension Preservation and Savings Expansion Act of 2003

30-Year Treasury Rate

Cash Balance Pension

(See Attached Continuation Sheet)

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

Check if None

House of Representatives

Senate

Department of Treasury

Department of Labor

Executive Office of the President

Council of Economic Advisors

Domestic Policy Council

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
David N. Barnes	
Geri J. Colombaro	
Edmund F. Perry	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Check if None

Signature _____ Date _____

International Business Machines Corporation (I

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area RET**

16. Specific lobbying issues

U.S. Treasury Department's Proposed Cash Balance Pension Regulation
H.R. 2989/S. 1589 Transportation, Treasury, and Independent Agencies Appropriations
Act, 2004
House and Senate Cash Balance Pension Amendments

International Business Machines Corporation (

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area RET**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Paul R. Redifer
..... Adrienne G. Rhone
..... Susan M. Siemietkowski
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Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each cod information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- Government/Private Sector Research and Development Partnerships
- H.R.2754/S. 1424 Energy and Water Development Appropriations Act, 2004
- Accelerated Strategic Computer Initiative (ASCI)
- Civilian DOE Computer Simulation Technology
- Physical Science Research

(See Attached Continuation Sheet)

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

Check if None

- House of Representatives
- Senate
- Executive Office of the President
- Office of Science and Technology Policy
- Office of Management and Budget

(See Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Yolanda L. Comedy	
Kathleen N. Kingscott	
Edmund F. Perry	
Edgar H. McCulloch III	
Brian J. Raymond	
(See Attached Continuation Sheet)	

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

Check if None

Signature _____ Date _____

International Business Machines Corporation (

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area SCI**

16. Specific lobbying issues

H.R. 2799/S. 1585 Departments of Commerce, Justice, and State, the Judiciary, and Related
Agencies Appropriations Act, 2004

National Weather Service Funding

H.R. 2861/S. 1584 Veterans Affairs and Housing and Urban Development Appropriations
Act, 2004

National Science Foundation Funding

Life Sciences Research Funding

International Business Machines Corporation (

**Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area SCI**

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

Department of Commerce

Department of Energy

Defense Programs

Office of Science

Department of Defense

National Security Agency

Department of the Navy

Defense Advanced Research Projects Agency

National Science Foundation

Directorate for Computers and Information Sciences and Engineering

International Business Machines Corporation (

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area SCI**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
Paul R. Redifer		
Adrienne G. Rhone		
Susan M. Siemietkowski		
Steven W. Stewart		
William H. Warner		

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code 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
 - U.S.-Japan Tax Treaty
 - U.S.-Netherlands Tax Treaty
 - U.S.-U.K. Tax Treaty
- Australia and Mexico Tax Protocols

(See Attached Continuation Sheet)

17. House(s) of Congress and Federal agencies contacted
- House of Representatives
 - Senate
 - Executive Office of the President
 - Office of the United States Trade Representative
 - Department of Treasury
 - Internal Revenue Service

- Check if None
- Department of Commerce
- Department of State
- Securities and Exchange Commission

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Linda C. Evans	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
(See Attached Continuation Sheet)	

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

Signature _____ Date _____

International Business Machines Corporation (**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area TAX**

16. Specific lobbying issues

Repeal and Replacement for Foreign Sales Corporation - Extraterritorial Income Exclusion
Revision of Internal Revenue Code Subpart F on Deferral of Taxation
Repeal Limitation on Use of Foreign Tax Credits under the Corporate Alternative Minimum
Tax
Treasury "Check-in-the-Box" Regulations
Taxation of Software (Section 18) Regulations
Taxation of Internet Transactions and Software
Fundamental Tax Reform
Internet Taxation
European Union Proposal for Taxation of Electronic Commerce, VAT Directive
Active Financing Exception to Subpart F
Research and Development Tax Credit Regulations
Research and Development Tax Credit Refinement
Stock Options and Payroll Taxes
IRS Notice 2001-72
IRS Notice 2001-73
IRS Notice 2001-14
S. 1971 National Employee Savings and Trust Equity Guarantee Act
H.R. 2896 American Jobs Creation Act of 2003
Excluding Employee Taxes from ESPPs (Employee Stock Purchase Plans) and ISOs
(Incentive Stock Options)
Securities and Exchange Commission Implementation of P.L. 107-204 Sarbanes-Oxley Act
2002
Permanent Establishment (PE) Rules for Services in OECD
S. 1637 Jumpstart Our Business Strength (JOBS) Act
Foreign Sales Corporation - Extraterritorial Income Exclusion

International Business Machines Corporation (

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area TAX**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Timothy J. Sheehy
..... Susan M. Siemietkowski
..... Gregory W. Waddell
.....
.....
.....
.....
.....
.....

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

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

16. Specific lobbying issues

- International Telecommunications
- Regulatory Treatment of Internet Service Providers
- International Charging Arrangements for Internet Services
- Electronic Commerce Trade Policy

(See Attached Continuation Sheet)

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

Check if None

- House of Representatives
- Senate
- Executive Office of the President
- Office of the United States Trade Representative
- Department of Commerce
- Technology Administration
- National Telecommunications and Information Administration

(See Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Edmund F. Perry	
Brian J. Raymond	
Paul R. Redifer	
Adrienne G. Rhone	
Timothy J. Sheehy	
Susan M. Siemietkowski	
(See Attached Continuation Sheet)	

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

Check if None

Signature _____ Date _____

International Business Machines Corporation (

**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area TEC**

16. Specific lobbying issues

E-Rate
Spectrum Allocation/Spectrum Management
Ultra-Wideband
S.159 Jumpstart Broadband Act

International Business Machines Corporation (

**Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area TEC**

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

Department of State
International Communications and Information Policy
Federal Communications Commission

International Business Machines Corporation (

Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area TEC

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Steven W. Stewart
..... Gregory W. Waddell
.....
.....
.....
.....
.....
.....
.....

Registrant Name IBM Client Name Self

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each cot 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
- Electronic Commerce Trade Policy
- World Trade Organization (WTO) Work Program on E-Commerce
- WTO Negotiations Objectives Regarding E-Commerce
- WTO Trade Classification

(See Attached Continuation Sheet)

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

Check if None

- House of Representatives
- Senate
- Executive Office of the President
- Office of the United States Trade Representative
- National Economic Council

(See Attached Continuation Sheet)

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

Name	Covered Official Position (if applicable)
Christopher G. Caine	
Kimberly A. Marsho	
Edmund F. Perry	
Brian J. Raymond	
Paul Redifer	
Adrienne G. Rhone	
(See Attached Continuation Sheet)	

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

Check if None

Signature

Date

International Business Machines Corporation (**Continuation Sheet for Item 16 of
Lobbying Report Addendum for Issue Area TRD**

16. Specific Lobbying Issues

APEC Leaders' Agreement on Trade and the Digital Economy
 Asia Pacific Economic Cooperation
 Ministerial and Heads of State Meetings
 Free Trade Area of the Americas
 Agenda and Issue Development
 GATT Government Procurement Agreement
 Membership Expansion
 Adherence to the GATT Government Procurement Agreement
 Trade Agreements Act
 WTO Transparency Agreement
 North America Free Trade Agreement (NAFTA)
 Implementation and Preservation
 U.S.-Central America Free Trade Agreement
 U.S.-Singapore Free Trade Agreement
 U.S.-Chile Free Trade Agreement
 U.S.-Australia Free Trade Agreement
 U.S.-Morocco Free Trade Agreement
 U.S.-South Africa Customs Union Free Trade Agreement
 Export Controls Legislation
 Elimination of Statutory MTOPS Requirement
 Export Controls Regulations
 Deemed Export Regulations
 Microprocessor and Computer Export Regulations
 WTO GATS Negotiations
 WTO Information Technology Agreement
 WTO-Doha Development Agenda
 WTO Technical Barriers to Trade (TBT) Agreement
 OECD Guidelines for Multinational Enterprises
 China's WTO Accession Implementation
 Iraq Reconstruction
 H.R. 2989/S. 1589 Transportation, Treasury, and Independent Agencies Appropriations
 Act, 2004
 Competitive Sourcing Provisions

International Business Machines Corporation (

**Continuation Sheet for Item 17 of
Lobbying Report Addendum for Issue Area TRD**

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

Department of Commerce

Bureau of Industry and Security

International Trade Administration

Department of Defense

Acquisition, Technology, and Logistics

Command, Control, Communications, and Intelligence
Policy

National Security Agency

Department of State

Bureau of Political-Military Affairs

Bureau of Nonproliferation

Bureau of Economic, Business, and Agricultural Affairs

Department of Homeland Security

Bureau of Customs and Border Protection

U.S. Agency for International Development

International Business Machines Corporation (

**Continuation Sheet for Item 18 of
Lobbying Report Addendum for Issue Area TRD**

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

<u>Name</u>	<u>Covered Official Position (If Applicable)</u>	<u>New</u>
..... Susan M. Siemietkowski
..... Steven W. Stewart
..... Susan C. Tuttle
.....
.....
.....
.....
.....
.....

Lobbying Report Addendum for Item 19
Issue Areas TAX and TRD

19. For registrants identifying foreign entities in the Lobbying Registration (Form LD-1, line 14) or any updates: Int of each such foreign entity in the specific lobbying issues listed on line 16 above

Regarding Lines 14(a) and 14(b) of Form LD-1: None. Regarding Line 14(c) of Form LD-1, the term “direct interest” is not defined in the statute and its meaning remains ambiguous. IBM believes that its foreign subsidiaries have only an indirect and derivative interest in the lobbying activities covered by this Addendum. IBM’s foreign subsidiaries do not have the predominant interest in the matters for which IBM has engaged in lobbying activities since the parent company initiates, directs, finances and controls such activities and does not act merely as an agent for one or more of its subsidiaries. However, because the interpretation of “direct interest” remains uncertain we include a list of the major worldwide non-U.S. subsidiaries of the company. Depending on the meaning finally given to the statutory terms, one or more of these subsidiaries might be viewed as having a direct interest in one or more of the activities covered by this Addendum.

IBM World Trade Subsidiaries

IBM Argentina Holdings B.V.	IBM Korea, Inc.
IBM Australia Limited	IBM de Mexico, S.A.
IBM Oesterreich Internationale Bueromaschinen Gesellschaft m.b.H.	IBM Nederland N.V.
International Business Machines of Belgium S.A.	IBM New Zealand Limited
IBM de Bolivia, S.A.	International Business Machines A/S (Norway)
IBM Brasil-Industria, Maquinas e Servicos Limitada	IBM del Peru, S.A.
IBM Bulgaria Ltd.	IBM Philippines, Inc.
IBM Canada Limited - IBM Canada Limitee	IBM Polska Sp.z.o.o.
IBM de Chile, S.A.C.	Companhia IBM Portuguesa, S.A.
IBM China Company Ltd.	IBM Romania SrL
IBM de Colombia, S.A.	IBM East Europe/Asia Ltd.
IBM Croatia Ltd.	IBM Singapore Pte. Ltd.
IBM Ceska Republika spol. s.r.o. (Czech Republic)	IBM Slovensko spol.s.r.o. (Slovak Republic)
IBM Danmark A/S	IBM Slovenija d.o.o. (Slovenia)
IBM Middle East FZE	IBM South Africa (Pty) Ltd.
IBM del Ecuador, C.A.	International Business Machines, S.A. (Spain)
Oy International Business Machines AB (Finland)	IBM Svenska Aktiebolag
Compagnie IBM France, S.A.	IBM(Schweiz)-IBM (Suisse)-IBM(Svizzera)-
IBM Deutschland GmbH	IBM (Switzerland)
IBM Hellas Information Handling Systems S.A. (Greece)	IBM Taiwan Holdings B.V.
International Business Machines Corporation Magyarorszagi Kft (Hungary)	IBM Thailand Co. Ltd.
IBM Ireland Limited	IBM (International Business Machines) Turk Limi Sirketi
IBM Israel Limited	IBM United Kingdom Holdings Limited
IBM India Limited	IBM del Uruguay, S.A.
IBM Italia S.P.A.	IBM de Venezuela, S.A.
IBM Japan, Ltd.	

Registrant Name IBM Client Name Self

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 client

ISSUE UPDATE

24. General lobbying issues previously reported that no longer pertain

ECN

AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Name	Address	Principal Place of B (city and state or c

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

28. Name of each previously reported foreign entity that no longer owns, or controls, or is affiliated with the regist affiliated organization

Signature _____ Date _____

Printed Name and Title Christopher G. Caine, Vice President of Governmental Programs

Form LD-2 (Rev. 6/98)

Page