

Clerk of the House of Representatives
Legislative Resource Center
B-106 Cannon Building
Washington, DC 20515

<http://lobbyingdisclosure.house.gov>

Secretary of the Senate
Office of Public Records
232 Hart Building
Washington, DC 20510

<http://www.senate.gov/lobby>

LOBBYING REPORT

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

1. Registrant Name <input checked="" type="checkbox"/> Organization/Lobbying Firm <input type="checkbox"/> Self Employed Individual								
INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)								
2. Address <input type="checkbox"/> Check if different than previously reported								
Address1	600 14th STREET, NW	Address2	Suite 300					
City	WASHINGTON	State	DC	Zip Code	20005	-	Country	USA
3. Principal place of business (if different than line 2)								
City		State		Zip Code		-	Country	
4a. Contact Name			b. Telephone Number		c. E-mail		5. Senate ID#	
Mrs. LISA PALLUCONI			(202) 551-9313				19877-12	
7. Client Name <input checked="" type="checkbox"/> Self <input type="checkbox"/> Check if client is a state or local government or instrumentality							6. House ID#	
INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)							311230000	

TYPE OF REPORT 8. Year 2011 Q1 (1/1 - 3/31) Q2 (4/1 - 6/30) Q3 (7/1-9/30) Q4 (10/1 - 12/31)

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 Issue Activity

INCOME OR EXPENSES - YOU MUST complete either Line 12 or Line 13

12. Lobbying	13. Organizations
INCOME relating to lobbying activities for this reporting period was:	EXPENSE relating to lobbying activities for this reporting period were:
<u>Less than \$5,000</u> <input type="checkbox"/>	<u>Less than \$5,000</u> <input type="checkbox"/>
<u>\$5,000 or more</u> <input checked="" type="checkbox"/> \$ _____	<u>\$5,000 or more</u> <input checked="" type="checkbox"/> \$ <u>1,090,000.00</u>
Provide a good faith estimate, rounded to the nearest \$10,000, 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).	14. REPORTING Check box to indicate expense accounting method. See instructions for description of options.
	<input checked="" type="checkbox"/> Method A. Reporting amounts using LDA definitions only
	<input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code
	<input type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Internal Revenue Code

Signature Digitally Signed By: Christopher A. Padilla

Date 10/20/2011

Printed Name and Title Christopher A. Padilla, Vice President, Governmental Programs

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. Add additional page(s) as needed.

15. General issue area code Budget/Appropriations (one per page)

16. Specific lobbying issues

Basic Research Funding for Dept. of Energy, Office of Science - High Performance Computing: FY 12 Appropriation for HPC. Trusted Foundry.
 Department of Defense Appropriations; DoD JLENS Program; H.R. 2219: USSOCOM; Defense law enforcement records management; records of conflict records management.

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

U.S. HOUSE OF REPRESENTATIVES, U.S. SENATE, Defense - Dept of (DOD), Energy - Dept of

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

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
Adrienne	Rhone			<input type="checkbox"/>
Cheryl	Bruner			<input type="checkbox"/>
Christopher	Padilla			<input type="checkbox"/>
Craig	Bury			<input type="checkbox"/>
Jay B.	Perron			<input type="checkbox"/>
Lauren	Phelps			<input type="checkbox"/>
Mark	O'Riley			<input type="checkbox"/>
Timothy	Sheehy			<input type="checkbox"/>
				<input type="checkbox"/>

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

Printed Name and Title Christopher A. Padilla, Vice President, Governmental Programs

Climate and Weather Records: NOAA, JPSS Program; H.R. 2596, S. 1572: climate records for modeling and climate change mitigation.

GSA-Office of Government-Wide Policy budget for SAM integration project.

Passage of Debt-Ceiling Legislation, S. 365, S. 627, H. Res. 384, S. 635.

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15. General issue area code (one per page)

16. Specific lobbying issues

Data security and breach notification: S. 1151 Personal Data Privacy and Security Act of 2011; S. 1408 Data Breach Notification Act of 2011; S. 1535 Personal Data Protection and Breach Accountability Act of 2011; S. 1207 Data Security and Breach Notification Act of 2011; S. 1434 Data Security Act of 2011; H.R. 2577 SAFE Data Act.
 Cybersecurity, acquisition reform and supply chain: S. 1458 Intelligence Authorization Act for FY12 (Sec 309); H.R.

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

U.S. HOUSE OF REPRESENTATIVES, U.S. SENATE, Commerce - Dept of (DOC), Homeland Security - Dept of (DHS), Natl Security Agency (NSA), U.S. Trade Representative (USTR)

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

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
Adrienne	Rhone			<input type="checkbox"/>
Christopher	Padilla			<input type="checkbox"/>
Edgar	McCulloch			<input type="checkbox"/>
Katie	Ignaszewski			<input type="checkbox"/>
Timothy	Sheehy			<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>

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

Printed Name and Title Christopher A. Padilla, Vice President, Governmental Programs

1892 Intelligence Authorization Act for FY 12 (Sec 308).

Cybersecurity-Implications for international trade: Response to Department of Commerce Green Paper on Cybersecurity, Innovation and the Internet Economy NOI; Response to White House Legislative Proposal.

Cloud computing.

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. Add additional page(s) as needed.

15. General issue area code (one per page)

16. Specific lobbying issues

H.R. 1249, the Leahy-Smith America Invents Act: U.S. Patent and Trademark Office Funding.
S. 968, Protect IP Act.

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

U.S. HOUSE OF REPRESENTATIVES, U.S. SENATE, Commerce - Dept of (DOC), Patent & Trademark Office (PTO)

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

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
Adrienne	Rhone			<input type="checkbox"/>
Christopher	Padilla			<input type="checkbox"/>
Dana	Gray			<input type="checkbox"/>
Edgar	McCulloch			<input type="checkbox"/>
Jay B.	Perron			<input type="checkbox"/>
Lauren	Phelps			<input type="checkbox"/>
Marcus	Williams			<input type="checkbox"/>
Timothy	Sheehy			<input type="checkbox"/>
				<input type="checkbox"/>

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

Printed Name and Title Christopher A. Padilla, Vice President, Governmental Programs

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. Add additional page(s) as needed.

15. General issue area code (one per page)

16. Specific lobbying issues

EPA Green House Gas reporting rule for semiconductor facilities.

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

U.S. HOUSE OF REPRESENTATIVES, U.S. SENATE, Environmental Protection Agency (EPA),

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

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
Christopher	Padilla			<input type="checkbox"/>
Edgar	McCulloch			<input type="checkbox"/>
Lauren	Phelps			<input type="checkbox"/>
Marcus	Williams			<input type="checkbox"/>
Timothy	Sheehy			<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>

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

Printed Name and Title Christopher A. Padilla, Vice President, Governmental Programs

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. Add additional page(s) as needed.

15. General issue area code Financial Institutions/Investments/Sec (one per page)

16. Specific lobbying issues

Dodd-Frank Wall Street Reform: Pay Ratio
Proposed Rulemaking: Pension Swaps

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

U.S. HOUSE OF REPRESENTATIVES, U.S. SENATE, Commodity Futures Trading Commission (CFTC), Labor - Dept of (DOL),

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

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
David	Barnes			<input type="checkbox"/>
PJ	Edington			<input type="checkbox"/>
Meredith	Singer			<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>

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

Printed Name and Title Christopher A. Padilla, Vice President, Governmental Programs

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. Add additional page(s) as needed.

15. General issue area code

HCR	Health Issues
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 (one per page)

16. Specific lobbying issues

The Patient Protection and Affordable Care Act - impact on IBM and its employees.

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

Health & Human Services - Dept of (HHS),

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

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
David	Barnes			<input type="checkbox"/>
PJ	Edington			<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>

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

Printed Name and Title Christopher A. Padilla, Vice President, Governmental Programs

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15. General issue area code (one per page)

16. Specific lobbying issues

Fair Labor Standards Act.
 Pension Provisions: Swaps issue; Investment advice; Fiduciary definition
 Immigration Reform: Business Visa Issue
 Competition Policy.

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

U.S. HOUSE OF REPRESENTATIVES, U.S. SENATE, Homeland Security - Dept of (DHS), Labor - Dept of (DOL), Pension Benefit Guaranty Corporation (PBGC), State - Dept of (DOS)

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

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
Adrienne	Rhone			<input type="checkbox"/>
Christopher	Padilla			<input type="checkbox"/>
David	Barnes			<input type="checkbox"/>
Edgar	McCulloch			<input type="checkbox"/>
Jay B.	Perron			<input type="checkbox"/>
Lauren	Phelps			<input type="checkbox"/>
Timothy	Sheehy			<input type="checkbox"/>
Meredith	Singer			<input type="checkbox"/>
PJ	Edington			<input type="checkbox"/>

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

Printed Name and Title Christopher A. Padilla, Vice President, Governmental Programs

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. Add additional page(s) as needed.

15. General issue area code (one per page)

16. Specific lobbying issues

U.S. international tax including deferral, foreign tax credits: H.R. 2735 "Revise IRC to make permanent Section 954(c)6 CFC Look-through for related party payments; H.R. 749" Revise IRC to make permanent active financing exemption Section 954 H. Corporate tax reform: Support competitive corporate tax rate and competitive international tax system and competitive IP incentives.

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

U.S. HOUSE OF REPRESENTATIVES, U.S. SENATE, Treasury - Dept of,

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

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
Christopher	Padilla			<input type="checkbox"/>
Dana	Gray			<input type="checkbox"/>
Edgar	McCulloch			<input type="checkbox"/>
Jay B.	Perron			<input type="checkbox"/>
Lauren	Phelps			<input type="checkbox"/>
Linda	Evans			<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>

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

Printed Name and Title Christopher A. Padilla, Vice President, Governmental Programs

R&D tax credit (alternative simplified credit, ASC): S. 1577, "Greater Research Opportunities with Tax Help Act;" H.R. 942, "The American Research and Competitiveness Act of 2011".

Other Treasury and IRS regulations: Effects of proposal to tax excess returns on transfers of IP; pool foreign tax credits and restrictions on deferred interest deductions; H.R. 674, "3% withholding tax on certain federal contracts".

Bilateral income tax treaties: Treaties between US and Spain, Korea, Singapore, Brazil, India and China.

OECD guidelines and U.S. Treasury comments on taxation: Taxation of intangibles including services and software.

Employee-Related Tax Reform: H.R. 1864 "Mobile Workforce Act"

Other: Tax issues as discussed in the Joint Select Committee on Deficit Reduction aka Supercommittee; H.R. 1439 "Business Activity tax BATSA"

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. Add additional page(s) as needed.

15. General issue area code (one per page)

16. Specific lobbying issues

Proposed rulemaking under 21st Century Communications and Video Accessibility.

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

Federal Communications Commission (FCC),

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

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
David	Barnes			<input type="checkbox"/>
PJ	Edington			<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>

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

Printed Name and Title Christopher A. Padilla, Vice President, Governmental Programs

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. Add additional page(s) as needed.

15. General issue area code Trade (Domestic/Foreign) (one per page)

16. Specific lobbying issues

Government procurement: China and India market access issues.
 Rare earth minerals, domestic supply, and China export restrictions.
 Trade Agreements: Free Trade Agreements (South Korea, Colombia, and Panama) and digital economy agreements.
 APEC-Innovation.

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

U.S. HOUSE OF REPRESENTATIVES, U.S. SENATE, Securities & Exchange Commission (SEC), State - Dept of (DOS), U.S. Trade Representative (USTR),

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

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
Christopher	Padilla			<input type="checkbox"/>
Dana	Gray			<input type="checkbox"/>
Debra	Marks			<input type="checkbox"/>
Ed	Gillespie			<input type="checkbox"/>
Edgar	McCulloch			<input type="checkbox"/>
Steve	Stewart			<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>

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

Printed Name and Title Christopher A. Padilla, Vice President, Governmental Programs

WTO: ICT Trade Principles.
Bi-lateral trade issues and policy (China and India).
Export/Import Regulation Reform.
Digital Economy Trade Agreements.
Conflict Minerals.

Information Update Page - Complete ONLY where registration information has changed.

20. Client new address

Address _____
 City _____ State _____ Zip Code _____ - _____ Country _____

21. Client new principal place of business (if different than line 20)

City _____ State _____ Zip Code _____ - _____ 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

	First Name	Last Name	Suffix	First Name	Last Name	Suffix
1	Jay B.	Perron		3		
2	Lauren	Phelps		4		

ISSUE UPDATE

24. General lobbying issue that no longer pertains

AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Internet Address:

Name	Address				Principal Place of Business (city and state or country)
	Street Address	State/Province	Zip	Country	
	City				City
					State Country
					City
					State Country

26. Name of each previously reported organization that is no longer affiliated with the registrant or client

1	2	3
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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	Ownership percentage in client
	Street Address	State/Province	Country			
	City			City		%
				State		
				Country		

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

1	3	5
2	4	6

Printed Name and Title Christopher A. Padilla, Vice President, Governmental Programs