

Addition of TAR (miscellaneous tariff bill) to Lobby Issue Codes

September 22, 2009

We have added to the General Issue Code category list a new code "TAR - Tariff (Miscellaneous Tariff Bills)" for use in new filings. Filers should use this general issue area code in the same way as other general issue area codes. For example, filers should use the issue code TAR to report lobbying activity related to tariff issues such as miscellaneous tariff issues. For any other trade-related issues, filers should use the TRD code. In particular, if a registrant lobbies on miscellaneous tariff issues, the registrant should use the updated form.

In using the new TAR general issue area code, filers should describe the specific lobbying issue on Line 16 in accordance with existing Guidance. For example:

Registrant "R" is retained by Client "B" to pursue a bill to provide a temporary tariff suspension for chemical X, and a separate bill to provide a temporary tariff reduction for chemical Y. During the first quarter of 2008, "R" made lobbying contacts concerning both matters on behalf of "B" and a separate bill was introduced for each matter (S. 123 for chemical X and S. 456 for chemical Y). "R" reports in its filing for Q1 that the general issue area code for these bills is "TAR," and the specific issues lobbied upon were the substance of the bills, citing to the bill number, if a bill has been introduced (e.g., "temporary tariff suspension for chemical X (S.123) and temporary tariff reduction for chemical Y (S.456)"). In the Q3 reporting period, the two chemical tariff provisions are each rolled into an omnibus bill (e.g., S.789, the "Miscellaneous Tariff Bill"). If "R" had lobbying activities during the Q3 reporting period encompassing all three bills, then "R" reports that the general issue area code for these bills is "TAR" and the specific issues lobbied upon were the substance of the bills (e.g., "temporary tariff suspension for chemical X and temporary tariff reduction for chemical Y, included in the original bills (S.123 and S.456) and in the Miscellaneous Tariff Bill (S.789)"). In Q4, "R" had lobbying activities focusing on the omnibus bill which "R" then discloses on its Q4 report, using TAR for the general issue area code as well as reporting the specific issues lobbied upon ("modification focused on tariff suspension for chemical X and tariff reduction for chemical Y, included in Miscellaneous Tariff Bill (S. 789)").