

INTERNATIONAL BUSINESS MACHINES CORP

Form 4

November 01, 2010

FORM 4

**UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549**

OMB APPROVAL

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STATEMENT OF CHANGES IN BENEFICIAL OWNERSHIP OF SECURITIES

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934, Section 17(a) of the Public Utility Holding Company Act of 1935 or Section 30(h) of the Investment Company Act of 1940

(Print or Type Responses)

1. Name and Address of Reporting Person *
MILLS STEVEN A

2. Issuer Name and Ticker or Trading Symbol
INTERNATIONAL BUSINESS MACHINES CORP [IBM]

5. Relationship of Reporting Person(s) to Issuer
(Check all applicable)

(Last) (First) (Middle)
IBM CORPORATION, 294 ROUTE 100
(Street)

3. Date of Earliest Transaction (Month/Day/Year)
10/29/2010

____ Director _____ 10% Owner
 Officer (give title below) _____ Other (specify below)
Senior Vice President

SOMERS, NY 10589

4. If Amendment, Date Original Filed(Month/Day/Year)

6. Individual or Joint/Group Filing(Check Applicable Line)
 Form filed by One Reporting Person
 Form filed by More than One Reporting Person

(City) (State) (Zip)

Table I - Non-Derivative Securities Acquired, Disposed of, or Beneficially Owned

1. Title of Security (Instr. 3)	2. Transaction Date (Month/Day/Year)	2A. Deemed Execution Date, if any (Month/Day/Year)	3. Transaction Code		4. Securities Acquired (A) or Disposed of (D) (Instr. 3, 4 and 5)		5. Amount of Securities Beneficially Owned Following Reported Transaction(s) (Instr. 3 and 4)	6. Ownership Form: Direct (D) or Indirect (I) (Instr. 4)	7. Nature of Ownership (Instr. 4)
			Code	V	Amount	(A) or (D)			
Common Stock	10/29/2010		S		2,500	D	\$ 142.59	207,203.55	D
Common Stock	10/29/2010		S		1,523	D	\$ 142.6	205,680.55	D
Common Stock	10/29/2010		S		1,100	D	\$ 142.605	204,580.55	D
Common Stock	10/29/2010		S		3,339	D	\$ 142.61	201,241.55	D
Common Stock	10/29/2010		S		300	D	\$ 142.6125	200,941.55	D

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Common Stock	10/29/2010	S	900	D	\$ 142.615	200,041.55	D
Common Stock	10/29/2010	S	7,050	D	\$ 142.62	192,991.55	D
Common Stock	10/29/2010	S	100	D	\$ 142.6213	192,891.55	D
Common Stock	10/29/2010	S	3,400	D	\$ 142.625	189,491.55	D
Common Stock	10/29/2010	S	7,437	D	\$ 142.63	182,054.55	D
Common Stock	10/29/2010	S	1,100	D	\$ 142.635	180,954.55	D
Common Stock	10/29/2010	S	300	D	\$ 142.6375	180,654.55	D
Common Stock	10/29/2010	S	10,115	D	\$ 142.64	170,539.55	D
Common Stock	10/29/2010	S	100	D	\$ 142.6413	170,439.55	D
Common Stock	10/29/2010	S	100	D	\$ 142.6425	170,339.55	D
Common Stock	10/29/2010	S	1,200	D	\$ 142.645	169,139.55	D
Common Stock	10/29/2010	S	1	D	\$ 142.648	169,138.55	D
Common Stock	10/29/2010	S	24,674	D	\$ 142.65	144,464.55	D
Common Stock	10/29/2010	S	850	D	\$ 142.655	143,614.55	D
Common Stock	10/29/2010	S	300	D	\$ 142.6575	143,314.55	D

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly.

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

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Table II - Derivative Securities Acquired, Disposed of, or Beneficially Owned
(e.g., puts, calls, warrants, options, convertible securities)

1. Title of Derivative Security (Instr. 3)	2. Conversion or Exercise Price of	3. Transaction Date (Month/Day/Year)	3A. Deemed Execution Date, if any (Month/Day/Year)	4. Transaction Code (Instr. 8)	5. Number of Derivative	6. Date Exercisable and Expiration Date (Month/Day/Year)	7. Title and Amount of Underlying Securities	8. Price of Derivative Security (Instr. 5)	9. Nu Deriv Secur Bene
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