



*Making our World Safer®*

November 8, 2011

To the Office of Government Ethics:

On behalf of the National Safety Council I am writing to urge you to rescind your proposed rule to part 2635, prohibiting federal employees from attending association trade shows. Disengagement of our government in gatherings that focus on national leadership and sharing best practices is extremely troubling on several counts. Allow me to use our own event, where safety leaders meet to discuss and advance safety through the workplace, as a case in point.

I have just returned from our National Safety Council Congress & Expo – the largest annual gathering of safety professionals in the country – and the absence of hundreds of federal employees was not only obvious but a cause for concern. Events like ours provide a chance to review the latest in industry news, breakthroughs, cutting edge products and research. In our case, we offered more than 130 Technical Sessions and 26 professional development seminars that presented processes and solutions that can be immediately applied for safer workplaces. The sessions are current, relevant and actionable, and all are delivered by industry experts. In many cases, Continuing Education Units, Continuance of Certification and Certification Maintenance credits are earned at these sessions. These learning opportunities are critical for your safety professionals, to hone their skills and strengthen the safety programs of our nation's largest employer.

In addition, a wide range of government personnel are looked to as safety leaders themselves, from OSHA to officials in the Department of Defense. Their participation enriches the discussion of safety for all of us -- exploring policies, partnering with NSC in promoting safety and certainly lending perspective on future direction. Our Congress & Expo, like many trade shows, offers a venue for large-scale interaction. Silencing the voice of our government's safety leaders not only diminishes the conversation but the effectiveness of the entire event.

Since Congress first chartered the National Safety Council in 1953, we have enjoyed a special and profound relationship with the safety community within the federal government. For more than 30 years I have personally witnessed the value of their input and have been continually impressed and humbled by the support and generous engagement of these leaders in keeping people safe at work, on the roads and in

homes and communities across our country. During this challenging economic time, we can all appreciate the need to do more with fewer resources; however, it is ill-advised to shortchange investment in our more important asset – our people – and eliminate platforms for our government leaders to share their expertise and champion critical issues , in our case – safety.

The National Safety Council mission is to prevent injuries and save lives. For decades the U.S. government has been our partner in that mission. The Office of Government Ethics proposed rule threatens that legacy and the safety of millions of federal government lives. We hope you will reconsider.

If it would be helpful to discuss this crucial decision further, please do not hesitate to contact me. Thank you.

Sincerely,

A handwritten signature in black ink, reading "Paulette Moulos". The signature is written in a cursive style with a large, stylized initial "P".

Paulette Moulos  
Executive Vice President and Chief Operating Officer  
National Safety Council