

To: The Office of Government Ethics
RE: RIN 3209-AA04:

As an association employee I am writing to comment on the referenced proposed rule, which restricts Executive Branch employees of the Federal Government from using exceptions to accept gifts from lobbying organization, including invitation to widely attended gatherings.

While I fully support the efforts of your agency to promote strong ethical standards, it is my feeling that certain widely attended gatherings, such as my organization's annual conference can and does serve the federal employees in attendance. I agree that federal employees should be able to accept offers of free attendance to events that provide an educational or professional development benefit that furthers the interest of their agency, and setting policies that restrict knowledge sharing between the government and associations is counterproductive to the need to develop productive partnerships.

As ASAE points out, "there are countless examples of legitimate, substantive trade association programming that intersect with the government's interests." It is therefore important to the nation's economic growth that this proposed business and educational relationship inhibitor be removed from the proposed regulation.

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