

October 13, 2011

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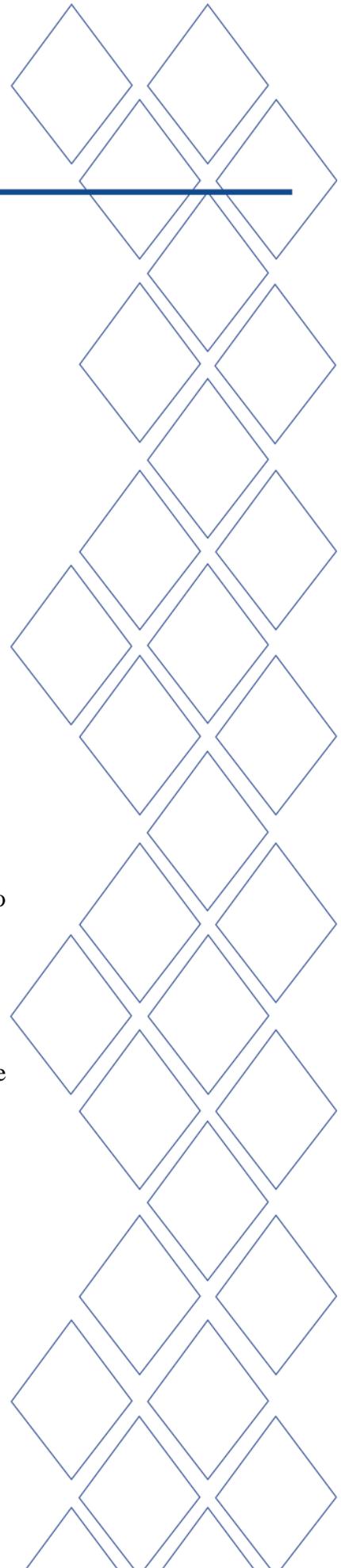
RE: RIN 3209-AA04 [Proposed Amendments Limiting Gifts from Registered Lobbyists and Lobbying Organizations]

Dear Mr. Fox:

It is obvious that your office has spent considerable analysis on the proposed rules to limit gifts for registered lobbyists and lobbying organizations (RIN 3209-AA04). Many public and private organizations have created gift rules to eliminate undue influence to decision-makers, yet undue influence remains a concern for government and industry. We understand the proposed rule will restrict government employees from attending all events organized by trade associations. We believe this restriction is not in the public interest and encourage your office to consider other mechanisms to address any perceived undue influence that the proposed rules attempt to address.

It make sense in today's world, were we will only be stronger by borrowing brilliance, partnering and collectively sharing, that the federal government encourage government employees to evaluate and attend events organized by trade associations where they can be players in crucial conversations.

I am a firm believer that the more we do together the better we will all be. A level of honesty and respect, combined with collectiveness and inclusion, will benefit the private, public and not-for-profit sectors. I trust that our public employees can be trained to be ethical while being encouraged to create solutions that make us more effective by working together. Sometimes this interaction will be fostered at events where problems are identified or processes evaluated. Please let governmental employees be at the table for these types of discussions no matter who organizes them.



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When we shared with our members, executives that work for associations headquartered in Michigan, that the Office of Government Ethics was considering restricting attendance at trade association events I received a variety of stories that demonstrated the value of collaboration of the public sector at trade association events.

Please let me share a few of these examples:

**The invention of crossover roadways midway through highway construction zones.**

This was the idea of private road contractors from Michigan shared with Department of Transportation engineers. It was a result of discussions that arose at a convention about how to make road construction occur faster and be less disruptive to motorists. By switching traffic over at different places through the construction project the contractor was able to work on both sides of the highway and maintain their process and speed up the completion time of the project. The conversation that was started at that convention was finalized by conversations with select engineers from the department and implemented that year.

**The collaboration of what governmental park lands should be open and groomed for snowmobilers.**

In Michigan we love our change of seasons. We play in all of them, especially winter. We ski, skate, snowshoe and ride snowmobiles. The interaction between the recreation users and park officials is essential to make sure we have safe facilities in high travel areas. The US Department of the Interior learns about the changes in recreational users needs through interaction with the recreation industry. The recreational users learn about new developments from the agency through their association events. Together they learn, converse, coordinate and work collectively on campaigns such as the safe snowmobiling efforts.

**Public sector building administrators learning from peers and experts about the management, operation and maintenance of the various building they are responsible for in their positions.**

The Building Owners & Managers Association (BOMA) of Metro Detroit is a trade association whose membership includes federal employees of the General Services Administration (GSA). The GSA provides workspace and related services for over 100 federal client agencies serving more than one million workers through the GSA's Public Buildings Service. Their membership facilitates the opportunity to borrow brilliance from the other members who own or manage commercial real estate. BOMA is a primary source of information on building management and operations, development, leasing, building operating costs, energy consumption patterns, local and national building codes, legislation, occupancy statistics, technological developments and new

industry trends. Public buildings make up a significant portion of the country's building inventory. Keeping current with industry best practices and technology development is beneficial in the deployment of tax dollars in public spaces.

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I think these three diverse stories provide a sample of the beneficial results interaction with associations, who provide a defined, target audience, provides to public sector employees and administrators.

Today's economy needs us to do more with less which results in being creative and innovative. Even though innovation may not occur at every event, events of this type facilitate communications and problem solving while sowing the seeds of innovation. Change these proposed rules to allow employees to attend events, where they can interact with the sectors they regulate or their peers so they can understand the problems facing industry, generate ideas for constant improvement and help be part of the solution to issues requiring government oversight.

Thank you for giving this consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl Ronk". The signature is fluid and cursive, with a large initial "C" and "R".

Cheryl Ronk  
President  
Michigan Society of Association Executives

Cc: Senator Debbie Stabenow  
Senator Carl Levin