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November 9, 2011

Mr. Don Fox
Acting Director and General Counsel
Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005-3917

Dear Mr. Fox:

I am writing to request that you reconsider OGE's proposed rule (RIN 3209-AA04) that would restrict executive branch employees from attending widely attended meetings sponsored by trade associations. I am in full agreement with the reasoning laid out in the letter you received from the Ohio Society of CPAs on this subject.

The Agricultural Retailers Association (ARA) represents retailers and distributors in the agricultural supply chain; our members are the suppliers to America's farmers. They come in all shapes and sizes, from small private companies to cooperatives to multistate corporate entities. As all associations do, we come together to advocate common interests, share best practices, and educate our members. ARA represents between 5,000 and 6,000 retail outlets for farm supplies and about 75% of U.S. crop input sales to farmers go through ARA member companies.

As part of our mission to advocate on behalf of our members, inviting federal employees to participate in widely attended meetings is helpful both to our members and to the federal government. Attending trade association meetings is an efficient way for federal policymakers and executives to hear firsthand from the industries they oversee about the impacts, issues and challenges that matter to those companies and individuals. Without this input, agencies operate somewhat in the dark without the benefit of this counsel. The exchange also helps educate and communicate regulatory objectives to our members, assisting the agencies in their task of getting the word out and answering questions.

Our association has a good track record of working with federal regulatory agencies, including cooperative educational projects with the Environmental Protection Agency and good working relationships with the Department of Homeland Security, Department of Transportation, and the Department of Agriculture, to name a few. Much of this is the result of relationships built through past advisory committee service and being able to exchange ideas with federal officials when they participate in our meetings. The proposed rule would make working collaboratively with agency leaders more difficult, and it would have a chilling effect within the agencies as employees would become reluctant to participate in any activity connected to a trade association. Imposition of the rule would lead to federal policymaking in a vacuum, depriving agencies of a reliable way to assess the practical impacts of those policies. And it would likely accelerate the trend of lobbyist delisting so people would not be considered a "prohibited source" as described by the rule.

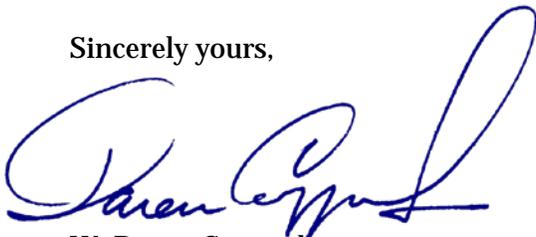
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Our members send us to Washington to communicate with federal agencies and legislators on their behalf, so that policymakers have a better understanding of regulated entities. They also send us in hopes of finding the most efficient ways of meeting public policy objectives while allowing private enterprise to grow the economy and create jobs. The principals of these companies are busy running their businesses and don't have the time or expertise to personally engage with Washington on these issues. They join trade associations to do this and to keep themselves informed.

Since we deal with Congress on many of these issues, many of our staff members are required to register as federal lobbyists. The Obama Administration has subsequently disqualified those so registered from serving on federal advisory committees, and in so doing has deprived the committees of valuable input and expertise. The message to our members has essentially been that their input doesn't matter. This rule would close another channel to obtain this input, further disenfranchise those whom we represent, and further deprive federal officials of valuable information.

Both the federal government and association members benefit from the exchanges that happen when federal officials participate in trade association meetings. This rule is a lose-lose proposition, and we respectfully urge you to not proceed with it.

Sincerely yours,



W. Daren Coppock
President & CEO