



INTERNATIONAL SIGN ASSOCIATION

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

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

Dear Mr. Fox:

The International Sign Association (ISA) is a 2,100 member trade association that represents manufacturers, suppliers, and users of on-premise signs and sign products from the 50 United States and 60 countries around the world. ISA supports, promotes, and improves the worldwide sign industry, which employs or directly impacts over 250,000 American workers and more than \$49 billion in annual shipments.

ISA is concerned about proposed rule RIN 3209-AA04, which restricts all executive branch employees of the Federal government from using certain exceptions to accept gifts from registered federal lobbyists and lobbying organizations, including invitations to widely attended gatherings (WAGs).

Under the proposed rule, OGE states that it “does not believe that employees, including political appointees subject to the Ethics Pledge, should be precluded categorically from accepting offers of free attendance at substantive events that would provide a legitimate educational or professional development benefit that furthers an interest of an agency.” In its reasoning for not including trade associations in that exclusion, OGE states that “Trade associations may sponsor educational activities for their members and even the public, but the primary concern of such associations generally is not the education and development of members of a profession or discipline, which is the focus of the proposed exclusion.” We respectfully disagree with that reasoning and logic.

While many trade associations engage in advocacy efforts, we also help resolve industry-wide issues that could otherwise threaten economic growth, and set safety and technical standards that benefit everyone in exactly the same way as professional associations, scientific organizations and learned societies. Further, the proposed rule does not take into account the important role that these organizations play in virtually every industry that the federal government seeks to regulate. A mutually beneficial relationship exists between government and trade associations’ interests, especially in regard to production, consumption, job creation and investment – and this requires a free exchange of ideas, knowledge and expertise to ensure fully informed policymaking and economic progress.

These educational and professional development programs conducted by trade associations such as ISA are virtually indistinguishable from those conducted by the other types of organizations listed in the proposed rule. They offer the same benefits to government employees and should qualify for the same exclusion.

We respectfully ask you to reconsider not including trade associations in the list of organizations that can extend invitations to government employees to attend WAGs. Thank you for your consideration of our concerns, and please contact our offices at (703) 797-0479 if you have any questions.

Sincerely,

Lori Anderson  
President & CEO  
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