

National Rural Water Association

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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]

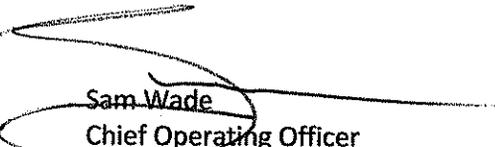
Dear Mr. Fox:

The National Rural Water Association's (NRWA) membership, through its State Affiliates, consists of 28,353 public water and wastewater systems. Annually NRWA trains over 100,000 water and wastewater utility personnel through its State Affiliates in each state. The proposed rule RIN 3209-AA04, which would restrict employees of the government from using certain exceptions to accept gifts from federal lobbyists and lobbying organizations, includes invitations to widely attended gatherings.

We would respectfully advocate that including trade associations in this restriction would be a disservice to the Rural Water membership and the general public. The attendance of regulatory staff and government officials at conferences or widely attended gatherings facilitates mutual understandings of issues, problems, and solutions. One of the biggest issues facing Rural America is well intended but uninformed agency personnel implementing ill informed policies and mandates that impacts economic health and job growth. Therefore, the presence of these officials at widely attended gatherings of trade associations cultivates awareness and can be considered educational on the part of both parties.

This provision, if it includes trade associations, will prevent the much needed interaction and understanding between the public and government agencies. We strongly encourage that trade associations be exempt from this provision.

Sincerely,


Sam Wade
Chief Operating Officer
National Rural Water