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Worldwide ERC®

November 18, 2011

Richard M. Thomas
Associate General Counsel
Office of Government Ethics
1201 New York Avenue NW, Suite 500
Washington, DC 20005

Re: "Proposed Amendments Limiting Gifts From Registered Lobbyists and Lobbying Organizations" (RIN 3209-AA04)

Dear Mr. Thomas:

On behalf of Worldwide ERC®, I would like to provide the following public comment regarding the Office of Government Ethics' (OGE) "Proposed Amendments Limiting Gifts From Registered Lobbyists and Lobbying Organizations" (RIN 3209-AA04).

Worldwide ERC® is the workforce mobility association for professionals who oversee, manage, or support U.S. domestic and international employee transfer. The organization was founded in 1964 to help members overcome the challenges of workforce mobility, and has continued to provide an ever growing menu of education, information, and training since then.

Our members come from many professions -- HR; recruiting, government; military; real estate; financial services; moving; counseling; consulting; and more. As the recognized authority on workforce mobility, Worldwide ERC® conducts unbiased research on a wide range of issues related to workforce mobility policy and programs, and makes it available to the industry and to the public.

As a membership association, Worldwide ERC® provides a wealth of products and services that contribute to the success of our members, and provides exclusive access to robust and constantly refreshed information, valuable networking and benchmarking opportunities and tools for career success in our constantly changing industry.

We also serve institutional members, including corporate America and companies providing goods and services in the employee mobility industry. In all, we have over 10,000 members worldwide. More about our association can be found at www.WorldwideERC.org.

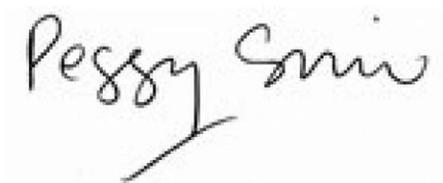
Worldwide ERC® supports OGE's mission to promote high ethical standards for executive branch employees, and likewise appreciates the OGE's intention to limit some of the exceptions that may have been used on occasion to permit certain gifts, such as invites to holiday parties or other social events, where the nexus to the government's interest is attenuated.

However, it is the potential for unintended consequences in this amendment that is of concern to our organization. Our association, like many if not most other associations was formed as a mechanism for the broad based education of individuals and companies that are a part of the employee mobility industry, which is a complicated multibillion dollar segment of the U.S. economy. Policies, best practices, risk management, personnel management, strategic management, tax and legal knowledge, and other high level skills are a requirement for successfully fulfilling this strategic corporate function. Worldwide ERC® core mission is to provide training and information on these issues.

Unfortunately, a broad reading of the amendment and the proposed exceptions could be used to limit the attendance of covered federal workers to some of our educational opportunities, to the detriment of their personal professional growth as well as to the efficiency of their employer, the federal government.

Because of this potential to our association as well as others, Worldwide ERC® supports the comments made by the American Society of Association Executives (ASAE) sent to you on October 5, 2011, and we urge your office to reconsider the proposed amendment with the goal of crafting a rule that will allow federal employees to attend substantive educational programs and events held by trade associations, for the same reasons that this exception has been extended to the other types of organizations listed in the proposed rule.

Sincerely,

A handwritten signature in black ink that reads "Peggy Smith". The signature is written in a cursive, flowing style.

Peggy Smith, SCRIP, SGMS
President and Chief Executive Officer
Worldwide ERC®