



December 7, 2011

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Mr. Don Fox
Acting Director and General Counsel
Office of Government Ethics
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Washington, DC 20005

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

Dear Mr. Fox,

Hearing Industries Association (HIA) is the national 501(c)(6) trade association of manufacturers of hearing aids, implantable hearing devices, assistive listening devices, component parts and power sources for amplification devices. HIA is registered to lobby in accordance with Lobbying Disclosure Act (LDA) rules, and we routinely file quarterly LDA reports as required.

HIA fully supports rules that promote ethics in government; however, we do not understand why trade associations are singled out in a proposed rule drafted by the Office of Government Ethics (OGE) to extend the lobbyist gift ban for political employees to all executive branch employees. The proposed rule would eliminate the "widely attended gathering" exemption for government employees who are invited to trade association events even though the rule provides exemptions for professional organizations and similar groups without regard to their LDA status. This unfairly singles out HIA events and programs as being somehow "corrupting," especially in comparison to events held by similar groups which would be exempted from the new restrictions.

HIA's meetings and events are indistinguishable from similar events hosted by groups that are exempted from the rule. For example, our Annual Meeting features presentations on hearing aid technical advances, innovations and issues that are of great interest to industry representatives as well as the government agency personnel who interact with our industry.

We, therefore, ask that OGE extend the same "widely attended gathering" exemption to trade associations that it provides for other similar organizations.

Sincerely,

Andrew Bopp
Director of Government Relations