



U.S. WHEAT
ASSOCIATES



December 14, 2011

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

Dear Mr. Fox,

U.S. Wheat Associates (USW) is the wheat industry's export market development organization. We receive funds from U.S. wheat producers and cost-share grants under the U.S. Department of Agriculture's Foreign Agricultural Service "cooperator" program to conduct activities across the globe. USW maintains 15 offices overseas, covering over 100 countries. During the course of USW's activities, we routinely invite government officials to participate in seminars, conferences and other events.

The National Association of Wheat Growers (NAWG) is the wheat industry's public policy organization, advocating for federal farm policy, environmental regulation and biotechnology on behalf of American wheat producers. NAWG is an active lobbying organization. While the two organizations are not one, and USW does not employ registered lobbyists, industry collaboration is crucial and our organizations hold regular joint board meetings. On occasion, NAWG employees attend USW-sponsored events to which government officials may be invited.

We are concerned that proposed rule RIN 3209-AA04 would prove to be an obstacle to the long-term cooperative efforts of USW and NAWG on international trade promotion for U.S. wheat farmers. Wheat producer leaders and staff from our two organizations conduct regular joint meetings and U.S. government officials are regularly invited to address our group or attend meetings to ensure a transparent exchange of information. It is important for the U.S. wheat industry to be able to dialogue with U.S. government employees on issues facing the industry. We encourage the Office of Government Ethics to reconsider this proposed rule and ensure that it does not create unintended consequences.

Please feel free to contact us if you have any questions.

Sincerely,

Shannon Schlecht
Director of Policy
U.S. Wheat Associates

Benjamin A. Bell
Director of Government Affairs for Farm Policy
National Association of Wheat Growers