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26 September 2011

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

RIN 3209-AA04
Proposed Amendments Limiting Gifts from Registered Lobbyists and
Lobbying Organizations

Dear Mr. Fox:

The International Association of Exhibitions and Events™ (IAEE) is a 501(c)(6) nonprofit trade association that represents the exhibitions and events industry. We currently have more than 8,000 members in 57 nations. The highest concentration of members is in the United States which accounts for approximately one-half of all the trade shows conducted in the world each year.

We are writing to express our profound concerns with regard to the proposed amendments (RIN 3209-AA04) that were published in the 13 September 2011 issue of the Federal Register. Let me hasten to add that we do support the adoption of rules that prevent unethical conduct by all individuals in the service of government whether elected, appointed or career government employees. We are fearful, however, that the proposed amendments in many instances are inconsistent, based upon erroneous assumptions and/or ambiguous. If adopted, they will materially impair the abilities and opportunities for those in government service to interact appropriately with the industries they are charged to regulate.

We strongly believe that the job functions and responsibilities of political appointees are substantially different from those of typical career government employees. Career government employees are the custodians of institutional history. They often understand the unique dynamics that are necessary to power private enterprise. They are often aware of trends and changes that impact the industries they oversee. They also serve as essential resources for political appointees who are transient and they can be instrumental in helping to shape and drive proper regulations. For these reasons, we think it unwise to apply the same rules amendments to both political appointees and career government employees. Each cohort deserves specific and unique treatment due to their differing roles and responsibilities.

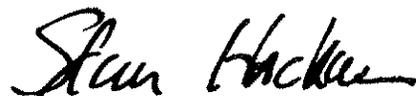
Distinctions are made in the proposed amendments between nonprofit professional associations, scientific organizations, learned societies and trade associations. We think this is unfair and inconsistent with existing law and regulations. We believe

that all 501(c) (6) organizations, whether professional societies or trade associations, should be treated uniformly and should all be exempt. It is untrue 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." This statement is not correct. The fact is that the focus of most trade associations is to provide their members with education, information, best practices and guidance. While many are engaged in government affairs and lobbying, those activities are almost always supplemental and subordinate to their main missions and purposes.

The widely attended gatherings sponsored by trade associations serve as the principal way that regulators can learn first-hand of the unique and special circumstances that affect the industries they regulate - circumstances that are often in flux and motion. Limiting the opportunities for those in government service to participate in these events will only serve to isolate regulators from important industry changes and trends of which they must be aware. The proposed amendments are far too broad and ambiguous in these respects and will serve to deny those in government service from making their own independent judgments based upon actual contact with industry. We therefore urge that you reconsider the specific conduct that may be unethical rather than focusing on the nature of the event(s) at which improper conduct might occur. This is a vitally important distinction that is not currently recognized in the proposed amendments.

IAEE would welcome the opportunity to work with your office to arrive at proposed amendments that would ensure a higher degree of ethical conduct without harming the important opportunities that must be preserved for those in government service to interact responsibly with industry at the events of all organizations that can provide information and insight that are so essential to proper and effective regulation.

Sincerely,

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

Steven Hacker, CAE, FSAE
President