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Public Comments on Standards of Ethical Conduct for Employees of the Executive Branch: Limiting Gifts from Registered Lobbyists and Lobbying Organizations:=====

Title: Standards of Ethical Conduct for Employees of the Executive Branch: Limiting Gifts from Registered Lobbyists and Lobbying Organizations

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A means that could potentially reduce and or clarify the intent of lobbyists sending invitations to political government employees about widely attended gatherings, could consist of all invitations going through some kind of clearing house of public record. What that could do is state the function, the intention of the function, why the appointee should be there, and any potential conflict of interest that might arise. A system of this sort could make it so that appointees could interact in a reasonable manner with clients, while it still limits the amount of undue influence that could arise.

I would like some clarification in regards to section involving exemptions. On page 56336 in the top of the third paragraph I would like to know how the \$20 de minimis exception that the pledge is supposed to root out is still present in the language of the rule itself. Do government political employees get a \$20 de minimis or don't they?

An area of potential contention that I could see occurring would stem from two separate areas of this rule. Trade associations are not exempt from the non-profit provision of this rule. The language states on page 56338 in regards to exempted organizations under these rules that, "the primary concern of such associations generally is not the education and development of members of a profession or discipline." What happens if a large trade group has an issue of debate or contention within its membership; especially on an issue that still has large societal focus that extends beyond the trade group i.e. the Chamber of Commerce and climate change? Would they still lack an exemption? Could they get a waiver to get an exemption if an issue like the one I just described does or did occur? To extrapolate on this issue further. Most trade groups have journals or magazines; would their

publications (especially built around debate within an industry) fall into the category of media (which is exempt) or would still lack an exemption being part