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November 3, 2011

Office of Government Ethics
Washington, DC

Re: Proposed amendments to part 2635

To whom it may concern:

Our Association has a very good relationship with EPA Region 8 and the state office of USDA RD. We extend invitation to these groups as a service to our membership and industry professionals that attend our training conferences.

Due to Wyoming's sparse population spread over a vast area, it is extremely cost effective for our Association and the agencies involved attending and receiving booth space gratis at our conferences. Our training conferences are the only trade shows in Wyoming where the agency (s) can make contact with its constituents in mass.

Wyoming is the only state in America that does not have primacy over implementation of the Safe Drinking Water Act. Our Primacy agency is the USEPA. As part of our training conferences, EPA Region 8 conducts an 8 hour rules and regulations update. This allows the agency maximum exposure to the greatest number of systems over which they regulate for the minimum in travel costs. The agency is able to update as many as 60-70% of all the licensed operators in the state at one time.

While Wyoming has an abundance of riches in its state coffers, funding for infrastructure projects is still a paramount concern to water and wastewater systems in Wyoming. Exposure at our conference allows USDA RD the same "bang for the buck" in reaching eligible loan participants. The conferences allow the agency to explain their programs or have initial discussions on upcoming projects with minimal travel costs.

While issues could arise with regulators mingling with those they regulate, in our instance, the potential for ethical issues is remote in view of the intention and exposure they receive.

We would request that provision be made for technical/training conference settings where exposure for minimal costs is considered in view of the national debt/deficit discussions.

Respectfully,

Mark Pepper
Executive Director