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Sent: Friday, November 04, 2011 12:44 PM

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



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Barbara Walker / Executive Director

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

Please stop, for once and for all, federal mixed messaging.

The Office of Government Ethics (OGE) has proposed a well-meaning, but inappropriate rule that will prohibit career Federal employees' free attendance at trade association educational and professional development events, seminars and trade shows.

The proposed rule restricts open access to vital information and knowledge-sharing opportunities between government employees and the members of our trade association. Our educational and professional development programs are virtually indistinguishable from those conducted by the other types of organizations listed in the proposed rule. They offer the same benefits to government employees and should qualify for the same exclusion.

Policies that restrict interaction and knowledge-sharing between the government and trade associations are counterproductive to the administration's stated aspirations to work in partnership with the business community to create jobs and grow the economy. State and federal lawmakers continue to hammer on community banks to jump start the economy, but then other policy makers and governmental agencies and instrumentalities propose idiotic rules to keep us from doing so!

Why would the administration want to isolate itself more than it already is from the industries they are charged with regulating? It's our economy, business and consumers who are suffering from rules like this. The unbalanced treatment of trade associations by OGE will undoubtedly discourage banking agency regulators them paying to attend our functions. The problem with the

rule is that it deems other types of association and nonprofit events to be appropriate, while implying that trade association programs have no value to government employees.

The proposed rule contains a very narrow definition of trade association activities from, of all places, the out-of-context Encyclopedia Britannica that ignores the important role these organizations play in virtually every industry that the government seeks to regulate. The administration and OGE say they're concerned about lobbying organizations using invitations to events as a means of cultivating access to federal employees. But it's clear from the proposed rule that you perceive trade associations as being different from other types of organizations that lobby on a regular basis. This is an uninformed position, and one that hampers business growth, job creation, professional development, innovation and collaborative problem-solving.

The proposed rule doesn't hurt trade associations as much as it hurts the individual businesses that we represent and the government employees who are seeking education and dialogue with the industries they regulate.

Thank you for considering the views of the Independent Bankers of Colorado, exclusively representing over 500 community bank locations across the State of Colorado.

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