



GEORGIA UTILITY CONTRACTORS ASSOCIATION, INC.

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November 8, 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 [Proposed Amendments Limiting Gifts from Registered Lobbyist and Lobbying Organizations; Proposed Amendments to part 2635]

Dear Mr. Fox,

On behalf of the Georgia Utility Contractors Association we appreciate the opportunity to comment on the proposed amendments to RIN 3209-AA04, part 2635, which prohibits federal employees from attending some association trade shows.

GUCA is a non-profit organization that represents 200 utility contractors in Georgia. Each year the GUCA hosts and our members attend several tradeshows. Through these tradeshows our members are able to educate themselves on the industry as well as to keep themselves abreast of changing trends that affect this industry.

One of the most important topics in our industry and at our tradeshows is safety. Jobsite and employee safety rank next to profit in importance in this industry. To that end, our members utilize federal representatives from OSHA, PHMSA, EPA, DOL, USDOT and other government entities at our tradeshows to educate themselves and their employees on what these organizations require and expect from them. Our members are able to build relationships with these safety organizations from their interaction at our tradeshows and in turn both utility contractors and federal safety organizations work together to promote safety for this industry's workforce.

If the OGE passes its rule that will prevent these safety representatives from attending these tradeshows, GUCA and the entire industry will lose a valuable link to our safety initiative. Without interaction at tradeshows, our members will not be able to build valuable relationships that lead to crucial education with these federal representatives. For these reasons, GUCA asks OGE to reconsider its position to prevent federal employees from attending some association tradeshows.

Sincerely,

Vikki McReynolds
Executive Director

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Copy: ASAE, The Center for Association Leadership

Voice of the Industry