

1635 Prince Street, Alexandria, Virginia 22314-2818 Telephone: (703) 683-4646 Fax: (703) 683-4745

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

Re: Proposed Amendments to Part 2635 (Limiting Gifts from Registered Lobbyists and Lobbying Organizations]

Dear Mr. Fox:

The Helicopter Association International (HAI) appreciates this opportunity to comment on the Office of Government Ethics' (OGE) proposed rule RIN 3209-AA04, which would restrict all executive branch employees of the Federal Government from using certain exceptions to accept gifts from registered federal lobbyists and lobbying organizations, including invitations to widely attended gatherings (WAGs).

HAI is a not-for-profit, 501(c) (6)) professional trade association which represents the interests of the international helicopter community. HAI has approximately 3,000 members, inclusive of 1,600 member companies in more than 74 nations. Our members fly more than 5,500 helicopters approximately 2.5 million flight hours per year.

We certainly applaud OGE's efforts to promote high ethical standards for executive branch employees, and generally accept OGE's intention to limit some of the exceptions that may have been used on occasion to permit certain gifts such as invitations to holiday parties or other social events, where the "nexus to the government's interest is attenuated."

However, HAI does strongly question what appears to be an indefensible double standard for the proposed changes to the availability of the exemption for widely attended gatherings, which unfairly discriminates against trade associations.

OGE clearly recognizes that certain widely attended gatherings can serve important government purposes and its proposed rule allows does allow federal employees to accept offers of free attendance for events held by Section 501(c)(3) organizations, institutions of higher education, and nonprofit professional associations, scientific organizations and learned societies. OGE correctly acknowledges the valuable educational and professional development opportunities provided by this type of programs----but then, OGE, inexplicably, denies this exemption to events held by trade associations.

This double standard indicates that the Office of Government Ethics does not fully understand the value of attending trade shows put on by non-profit organizations which are virtually indistinguishable from events hosted by the listed groups.

Every year, HAI produces and hosts the world's largest helicopter trade show---HELI-EXPO. This four day event attracts over 18,000 attendees and showcases the latest developments in helicopters, and related technology, safety equipment and training programs. Prior to and during the trade show, to promote professionalism and safety, we offer more than 25 education courses. During the show, over 20 committees, representing different mission segments or disciplines within the industry, meet to discuss the major issues affecting the industry. Every day, a multitude of forums, workshops and town hall meetings focus on safety and professional development. It is a jam-packed learning experience.

We do believe that the regulators of our industry do indeed benefit from a tremendous learning opportunity when they attend HELI-EXPO. Government employees tasked with promulgating regulations affecting our industry can learn about the latest developments, see new product demonstrations, and gain a better understanding of how our unique and diverse segment of aviation might be impacted by rulemaking. At HELI-EXPO, government employees have the opportunity to participate in our committee meetings and monitor our training courses. In turn, we believe that our own members benefit from interaction with a strong government presence because it provides them an opportunity to learn more about government agency interests, processes, and viewpoints. It is very difficult to understand why the educational and professional development benefits provided to federal employees by attendance at our trade show could be any less beneficial for federal employees than those conducted by the other types of organizations listed in the proposed rule.

Trade associations should not be unfairly singled out while other organizations, such as educational, professional, media or charitable organizations, even if they also employ lobbyists, are allowed to continue offering free attendance at widely attended events.

HAI strongly urges you to revise the proposed exception for gifts to allow federal employees to attend substantive educational programs and events held by trade associations for the same reasons that this exception has been extended to the other types of organization listed in the proposed rule.

Sincerely,

Matthew S. Zuccaro

arute 2 gr.

President