



ASSOCIATION OF  
EQUIPMENT MANUFACTURERS

AGRICULTURE  
CONSTRUCTION  
FORESTRY  
MINING  
UTILITY

November 14, 2011

U.S. Office of Government Ethics  
1201 New York Avenue, NW  
Suite 500  
Washington, D.C. 20005

Re: RIN 3209-AA04: Proposed Rule on Limiting Gifts to Federal Employees made by Registered Lobbyists and Lobbying Organizations

At a time of great economic uncertainty, American manufacturers and workers are struggling to obtain and create the jobs our country so desperately needs. The ability of the private sector to meet face to face with executive level decision makers within the federal government is critical to successfully create, understand and implement federal policy that supports American manufacturing. Preventing individuals within the federal government from attending conferences with American industries not only inhibits the federal government's ability to provide guidance and obtain vital information and understanding but will potentially have serious negative economic consequences when the federal government implements policies related to America's economic growth and jobs creation.

The Association of Equipment Manufacturers (AEM) is the U.S. based trade group serving the off-road equipment manufacturing industry. Our members number over 850 companies that manufacture equipment, products and services used worldwide in the agriculture, construction, forestry, mining and utility fields, and we employ hundreds of thousands of American workers.

Under the Proposed Rule, federal workers will no longer be able to accept free attendance unless they are speaking at the conference. If this rule were to go into effect, it would limit federal workers meeting with the American industries they are tasked with assisting. In the International Trade Administration there are two officials that serve as liaison to our construction and agriculture sectors. They often attend our conferences to hear firsthand the challenges facing our members and offer their guidance and assistance to help our members export. Limiting their interaction I believe would hurt not only American industry but ultimately undermine the President's National Export Initiative by preventing federal workers from gaining firsthand information on which policies are helping businesses increase exports, and which polices are hindering our combined effort.

AEM hosts industry trade shows that allow American manufacturers to display their equipment in front of potential U.S. and international buyers. The shows represent an unparalleled opportunity to meet with some of our nation's hardest working and most innovative workers and are typically attended by U.S. government employees in non-speaking roles.

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Our premier show, ConExpo/ConAgg, has an estimated 20,000 international attendees, many recruited to attend through the Department of Commerce's International Buyer Program (IBP). This is one of 35 shows supported annually by the IBP.

The IBP administers and facilitates prospective foreign business customers to meet directly with manufacturers and to discuss their products and potential sales. A number of government attendees to trade shows support the international delegations before, during and after the show and do not have direct speaking roles. Instead they act as information exchanges where government programs and industry concerns can be addressed.

AEM has benefited from the U.S. Commerce Department's involvement in our trade shows, whether through the International Buyer Program or Commerce officials' ability to meet with the workers of the U.S. industry they assist overseas. The proposed rule could significantly inhibit the Department of Commerce's ability to gain valuable firsthand knowledge on the challenges facing the industries they help represent and would be a great loss to American businesses looking to become more involved in federal government programs seeking to increase exports under President Obama's National Export Initiative.

AEM sincerely hopes that the Administration reconsider adopting this economically detrimental rule. With both the Administration and America's manufacturers trying to find ways of improving our nation's economic plight, now is not the time to create barriers to prevent us from working together to move America forward.

Sincerely,



Nick Yaksich  
Vice President  
Global Public Policy  
Association of Equipment Manufacturers