

american cleaning institute®
for better living

October 18, 2011

Don Fox
Acting Director and General Counsel
Office of Government Ethics
1201 New York Avenue, N.W.
Suite 500
Washington, DC 20005-3917

Dear Mr. Fox,

I am writing on behalf of the American Cleaning Institute, the trade association representing the U.S. cleaning products industry. ACI is appreciative of the opportunity to comment on proposed rule RIN 3209-AA04, written by the Office of Government Ethics (OGE). ACI is concerned that the practical effect of this proposed rule will restrict all executive branch employees of the Federal government from accepting invitations to widely attended events that may be sponsored by registered federal lobbyists and lobbying organizations.

The American Cleaning Institute is the trade association representing the \$30 billion U.S. cleaning products market. ACI members include the formulators of soaps, detergents, and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and oleochemical producers. ACI and its members are dedicated to improving health and the quality of life through sustainable cleaning products and practices. ACI's mission is to support the sustainability of the cleaning products industry through research, education, outreach and science-based advocacy. Since 1926, ACI has promoted health through personal hygiene and effective cleaning.

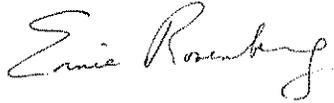
ACI recognizes OGE's mission to promote high ethical standards for executive branch employees. While ACI appreciates OGE's acknowledgement that government employees can accept free attendance at events where they are speaking or presenting information on behalf of the administration, the unbalanced treatment of trade association programs in the proposed rulemaking will likely discourage federal employees from availing themselves of these opportunities. The implication in the proposed rule that trade associations use invitations to events as a means of cultivating access by registered lobbyists makes it unlikely federal employees would pay out-of-pocket to attend these types of program and events, even if they would benefit from attending.

ACI respectfully requests OGE revise its proposed exception for gifts to allow federal employees to attend substantive educational programs and events held by trade associations.

Mr. Don Fox
Office of Government Affairs
October 18, 2011

Thank you in advance for your consideration and if you have any questions, please contact Douglas Troutman, Senior Director, Government Affairs at ACI, at (202) 662-2508 or dtroutman@cleaninginstitute.org or Evonne Jackson, Manager, Executive & Legal Affairs at ACI, at (202) 662-2510 or ejackson@cleaninginstitute.org.

Best regards,

A handwritten signature in cursive script that reads "Ernie Rosenberg". The signature is written in black ink and is positioned above the typed name and title.

Ernie Rosenberg
President & CEO