



Association of University Technology Managers®  
Advancing Discoveries for a Better World®

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November 3, 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 Lobbyists and Lobbying Organizations

Dear Mr. Fox:

I am writing you on behalf of the Association of University Technology Managers (AUTM). AUTM is a 501(c)6 professional society with over 3200 individual members. AUTM is a global network of technology transfer professionals who work in academic, research, government, legal and commercial settings. The AUTM mission is to promote, support and improve academic technology transfer worldwide while demonstrating its benefits globally through education, advocacy, networking and communication. AUTM members contribute to the economic welfare of the nation through job creation and product manufacturing, and directly affect technological progress through innovative activities.

I recently learned about proposed rule RIN 3209-AA04 – Proposed Amendments Limiting Gifts from Registered Lobbyists and Lobbying Organizations – and urge you to reconsider this restriction.

Nonprofit organizations, like AUTM, regularly hold multi-day forums on topics of concern to Americans and bring added value to a broad range of federal employees through expertise, additional perspectives and partnerships, in particular with the health and research agencies within the Department of Health and Human Services, the NIH, and the Department of Defense. These gatherings are unique opportunities for business leadership and members to gain new knowledge on pressing issues within their industry or area of interest.

Critical to this educational experience is the participation of federal employees. Restricting federal employees from attending or participating in these informative association events will hamper the ability of all concerned to build informed partnerships across the public and private sectors. This could well lead to delayed progress in technology commercialization.

I respectfully urge you to revise this proposed exception 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 organizations listed in the proposed rule.

Sincerely,

Robin L. Rasor, CLP, RTTP  
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