



November 13, 2011

Mr. Richard M. Thomas
Associate 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. Thomas:

The Security Industry Association (SIA) respectfully opposes the proposed Office of Government Ethics (OGE) rule that will severely limit the ability of federal government employees to participate in certain educational programs that meet the mission of their agencies. SIA firmly believes the proposed OGE rule prohibiting federal employees from accepting invitations to widely attended gatherings from registered lobbyists and trade associations defined as lobbying organizations should be immediately withdrawn.

SIA is a non-profit trade association representing nearly 400 member companies who are drivers of innovation within the electronic physical security industry. As a provider of educational programming to federal government employees and industry attendees at SIA conferences and trade shows, SIA is directly impacted by this proceeding.

In its proposed rule, the OGE recognizes that federal government employees, including political appointees, should be able to accept offers of free attendance to “substantive events that would provide a legitimate educational or professional development benefit that furthers the interests of an agency.” However, that exception only allows government employees to accept such invitations to attend educational and professional development activities held by Section 501(c) (3) organizations, institutions of higher education, nonprofit professional associations, scientific organizations and learned societies.

The exclusion of trade associations from that exception discriminates against SIA and a considerable number of trade associations that serve a critical role in virtually every industry. Businesses join trade associations to promote common interests, share best practices, receive insightful research, develop voluntary consensus standards, and learn about the latest developments in their industry. Though SIA and many other trade associations may engage in lobbying activities, SIA educational programming is not a lobbying tool or technique.

SIA is frequently contacted by government employees to develop technical programming that helps them protect thousands of federal facilities, employees, and visitors each day. For

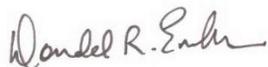
example, in 2010, the U.S. Department of Health and Human Services (HHS) requested that SIA create a training program for the federal government regarding the Federal Identity, Credentialing and Access Management (ICAM) Document (FICAM). FICAM is a comprehensive strategy to enhance security across federal government agencies. If adopted, the OGE rule will have the affect of depriving federal employees of similar educational programs that are directly requested by government employees. The OGE proposed rule will deprive government employees from receiving timely and relevant technical information that could save lives.

The training programs that SIA helps develop are created to offer true educational programs, not veiled commercial presentations. The expectation of commercial-free content is expressly stated in SIA policies and reiterated at various times in our direct communications with speakers. Additionally, SIA's educational our policies closely align with those established by the [American Society for Training & Development \(ASTD\)](#), the world's largest association dedicated to workplace learning and development professionals. ASTD's members come from more than 100 countries and connect locally in more than 125 U.S. chapters and with more than 20 international partners. Members work in thousands of organizations of all sizes, in government, as independent consultants, and suppliers. ASTD sets the standard for best practices in learning and performance.

Like SIA, ASTD adheres to a strict non-commercial content requirement and works diligently to monitor and ensure the integrity of its educational programs. ASTD is well equipped to determine what constitutes true education and training and, thus, we recommend the OGE consult with ASTD in matters pertaining to education, training and the accreditation and professional development for federal employees, rather than by broad stroke rendering programming delivered by lobbying organizations inaccessible. We respectfully urge the OGE to rely on the widely-recognized technical expertise of entities like ASTD before proposing requirements that could have far-reaching consequences for government employees and those they serve.

Thank you again for the opportunity to provide our views toward the proposed rule. SIA shares the goals of promoting ethical behavior within the federal government. However, we remain very concerned about the sweeping impact this proposal will have upon knowledge sharing between the federal government and technical experts who need to work together to secure our nation and its citizens.

Sincerely,



Donald R. Erickson
Chief Executive Officer
Security Industry Association