



AMERICAN ASSOCIATION OF AIRPORT EXECUTIVES

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November 10, 2011

Mr. Richard Thomas
Associate General Counsel
Office of Government Ethics
Suite 500
1201 New York Avenue, N.W.
Washington, D.C. 20005-3917

RIN 3209-AA04

Mr. Thomas:

On behalf of the thousands of members of the American Association of Airport Executives (AAAE), we offer the following comments on Proposed Rule RIN 3209-AA04, **Standards of Ethical Conduct for Employees of the Executive Branch; Proposed Amendments Limiting Gifts From Registered Lobbyists and Lobbying Organizations.**

The American Association of Airport Executives (AAAE) is a Nonprofit Professional Association formed in 1928, dedicated to the education and advancement of airport professionals across the country. AA AE provides education, training and professional development opportunities to over 5,000 individual members.

As part of our training and professional development efforts, we run nearly 100 workshops, meetings, seminars and conferences a year featuring industry experts across various disciplines, local, state and federal government officials, Members of Congress and congressional staff and other subject matter specialists.

While the rule in question proposes a specific exclusion for Nonprofit Professional Associations such as AA AE (Section 2635.203(h)(4)), we nonetheless remain concerned about the possible “chilling effect” the new rules may have on governmental participation in meetings, conferences and seminars we conduct throughout the country because of possible confusion on the part of governmental entities regarding the differentiation between Nonprofit Professional Association’s such as AA AE and trade organizations, which do not enjoy the same exclusion with respect to the educational activities they undertake.

We urge the Office of Government Ethics to withdraw the proposed rule because of the negative impact it may have on governmental participation in important conferences, seminars and meetings organized by various groups and organizations, including AA AE. If, however, the Office of Government Ethics determines it will move forward with the rule, we urge you to provide greater clarity and guidance to government employees and officials regarding their continued ability to attend and participate in the programs, conferences, workshops, seminars and professional development activities conducted by nonprofit professional associations such as the American Association of Airport Executives (AAAE).

Thank you for the opportunity to comment on the proposed rule.

Sincerely,

Todd Hauptli
Senior Executive Vice President
AAAE