

From: John S Satagaj

To: USOGE

Subject: Proposed Amendments to Part 2635

Date: Wednesday, October 05, 2011 4:39:41 PM

Attachments: [SBLC Comments on RIN 3209-AA04.pdf](#)

Our comments attached. Thank you



SMALL BUSINESS
LEGISLATIVE
COUNCIL

Small Business Legislative Council email@sblc.org, 202-639-8500

October 5, 2011

Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917
Attention: Richard M. Thomas, Associate General Counsel

RE: RIN 3209-AA04

On behalf of the nearly 60 small business trade associations that make up the Small Business Legislative Council (SBLC), we wish to submit the following comments regarding the proposed rule, “Standards of Ethical Conduct for Employees of the Executive Branch; Proposed Amendments Limiting Gifts From Registered Lobbyists and Lobbying Organizations.”

We disagree strongly with the conclusions and observations of the Office of Government Ethics (OGE) that have led the OGE to propose a prohibition on federal government employee participation in widely attended gatherings conducted by Internal Revenue Code Section 501(c)(6) trade associations.

The SBLC has been in existence for over 30 years. We exist to create opportunities for the federal government to understand how government policy will affect small business. Our long experience has taught us that you cannot get that from a piece of paper or theoretical models. You need to talk with real small business owners in a setting that is conducive to conversation, not speaking to them.

Good governance is not the absence of contact with interested parties, just the opposite is true – if government officials had more contact with small businesses they would be better qualified to administer small business assistance programs and to regulate small businesses. Widely attended gatherings provide some of the best opportunities for government officials to meet with a diverse group of small business owners. And the events provide the opportunities for small businesses owners to interact on an affordable, non-intimidating basis.

We fail to understand the logic that excludes trade associations from the exclusion that permits government employees to attend widely attended gatherings held by other types of organizations.

This proposed rule leaves common sense at the door. Let government officials in. And our nation’s small businesses and our federal policies will be better for it.

Sincerely,
John S. Satagaj
President and General Counsel

The Small Business Legislative Council is a 34 year old permanent, independent coalition of over 50 trade and professional associations that share a common commitment to the future of small business. Our members represent the interests of small businesses in such diverse economic sectors as manufacturing, retailing, distribution, professional and technical services, construction, transportation, and agriculture. Our policies are developed through a consensus among our membership. Individual associations may express their own views