July 5, 2011

Richard M. Thomas  
Associate General Counsel  
Office of Government Ethics  
1201 New York Avenue, N.W. Suite 500  
Washington, DC 20005–3917

RE: RIN 3209–AA09 [Proposed Rule Exemption and Amendment Under 18 U.S.C. 208(b) (2)]

Dear Mr. Thomas:

On behalf of the Federation of American Societies for Experimental Biology (FASEB), I thank you for the opportunity to comment on the Office of Government Ethics “Proposed Rule Exemption and Amendment Under 18 U.S.C. 208(b) (2).” FASEB represents 24 scientific societies with a collective membership of over 100,000 biomedical researchers and engineers.

We are in full support of the proposed rule change, which will facilitate the participation of federally employed scientists in their professional societies. These relationships are not only beneficial to individual scientists but also to non-profit groups, the government, and the public.

Full participation in non-profit professional activities fosters the professional development of federally employed scientists, enables them to establish relationships and collaborations with scientists with whom they ordinarily may not have contact, and allows them to maintain and advance their standing among their peers. As part of their service to these organizations, scientists are exposed to new ideas and have the opportunity to cultivate their leadership skills. It provides an invaluable source of continuing education.

The professional societies likewise benefit from the talent and perspectives of federally employed scientists. These organizations, dedicated to advancing research and education, share the public service goals of the federal government.

Federal agencies will also benefit from the new rule, as it will help them attract and maintain the highest caliber individuals in science and technical fields. This will enhance the ability of the agencies to better carry out their mission and serve the general public.
The proposed rule change has garnered widespread support from the research community. We add our wholehearted endorsement for the change and thank you for this thoughtful proposal to resolve a longstanding concern.

Sincerely,

Joseph C. LaManna, Ph.D.
FASEB President