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Built Environment Today

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September 2, 2016

Mr. Troy Cribb
Associate Administrator
Office of Government-wide Policy
US General Services Administration

RE: ASHRAE Comments on Federal Travel Regulation; Clarification of Payment in Kind for Speakers at Meetings and Similar Functions | FTR Case 2016-301 Docket No. 2016-0008, Sequence 1

Dear Mr. Cribb:

ASHRAE, founded in 1894, is a global society advancing human well-being through sustainable technology for the built environment. The Society and its more than 56,000 members worldwide focus on building systems, energy efficiency, indoor air quality, refrigeration and sustainability. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's built environment today.

On behalf of ASHRAE and its members, I submit the following comments for your consideration in response to GSA's proposal to amend the Federal Travel Regulation (FTR):

- 1) ***ASHRAE Supports the Proposal to Amend the FTR to Change the Definition of "Payment in Kind" Such that a Full or Partial Waiver of Registration-type Fees from Non-Federal Sources Is Not Considered a Payment in Kind to the Agency When an Employee Speaks, Presents, or Participates at a Meeting or Similar Function in Their Official Capacity.***
- 2) ***ASHRAE Does Not Support the Proposal to Limit the New Payment in Kind Definition to Only Those Instances Where Registration-type Fees Are Waived for All Speakers, Presenters, or Panelists.***
- 3) ***ASHRAE Supports the Proposal to Permit an Agency to Accept a Full or Partial Waiver of Registration-type Fees from Non-Federal Sources for the Duration of a Multi-day Meeting or Similar Function, Even if the Employee is Only Speaking for One Day.***

1) ASHRAE Supports the Proposal to Amend the FTR to Change the Definition of “Payment in Kind” Such that a Full or Partial Waiver of Registration-type Fees from Non-Federal Sources Is Not Considered a Payment in Kind to the Agency When an Employee Speaks, Presents, or Participates at a Meeting or Similar Function in Their Official Capacity.

A great number of ASHRAE Standards, Guidelines, Certifications, and other publications and services are required or otherwise used by the Federal government. Furthermore, many ASHRAE members are Federal employees or are impacted by Federal programs. As such, ASHRAE depends upon robust engagement with Federal officials as a key means of achieving ASHRAE’s Mission to “advance the arts and sciences of heating, ventilation, air conditioning and refrigeration to serve humanity and promote a sustainable world.”

Similarly, Federal employees benefit from the exchange of information and world-class professional development that takes place at ASHRAE’s conferences and meetings. Collectively, the involvement of Federal employees at ASHRAE events helps agencies advance their Missions and provides large-scale benefits to society. These benefits are maximized when all Federal employees are freely able to attend ASHRAE’s conferences and other meetings. Accordingly, ASHRAE is strongly in favor of eliminating all barriers that stand in the way of Federal employee’s participation at ASHRAE’s events. **We thus support GSA’s proposal to amend the definition of “payment in kind” in the FTR so that a full or partial waiver of registration-type fees from non-Federal sources is not considered a payment in kind to the agency when a Federal employee speaks, presents, or participates on a panel.**

2) ASHRAE Does Not Support the Proposal to Limit the New Payment in Kind Definition to Only Those Instances Where Registration-type Fees Are Waived for All Speakers, Presenters, or Panelists.

While ASHRAE supports GSA’s amendment proposal for payments in kind, we do not support the requirement to limit this definition to only those instances where registration-type fees are waived for all speakers, presenters, or panelists. Depending upon individual circumstances, ASHRAE will at times waive the registration fees for speakers at our events; however this is done on a case-by-case basis. ASHRAE does often provide reduced registration fees for speakers, however we do not provide nor do we support a blanket waiver of registration fees for all speakers at our conferences and other meetings. **As such, to facilitate the highest degree of Federal employee engagement, ASHRAE recommends that GSA not limit the proposed new definition for payments in kind to only those instances where registration-type fees are waived for all speakers.**

3) ASHRAE Supports the Proposal to Permit an Agency to Accept a Full or Partial Waiver of Registration-type Fees from Non-Federal Sources for the Duration of a Multi-day Meeting or Similar Function, Even if the Employee is Only Speaking for One Day.

Federal employees, agencies, taxpayers, and society at large all benefit from the professional development, networking, and exchange of ideas that take place at conferences and other meetings, such as those held by ASHRAE. Consequently, ASHRAE supports GSA's proposal to amend the FTR to permit an agency to accept a full or partial waiver of registration fees from non-Federal sources for the duration of a multi-day conference or similar meeting, even if the employee is only speaking for one day.

Conclusion & Follow Up

Thank you for your consideration of ASHRAE's comments and recommendations. Should you have any questions, please contact Mark Ames, ASHRAE's Senior Manager of Federal Government Affairs, at mames@ashrae.org or (202) 833-1830. We look forward to working with you on this matter of mutual importance.

Respectfully,



Timothy G. Wentz, P.E., HBDP, FASHRAE
President