



ETHICS RULES FOR BOARD MEMBERS OF THE FIRST RESPONDER NETWORK AUTHORITY

ETHICS RULES FOR FIRSTNET BOARD MEMBERS

Because the First Responder Network Authority (FirstNet) is an independent entity within the National Telecommunications and Information Administration, FirstNet board members are Federal employees subject to conflict of interest statutes and ethics regulations applicable to other Government employees.

TOP SEVEN ETHICS RULES

The following ethics rules are of particular relevance to service on the FirstNet board.

Financial Conflicts of Interest

1. You may not participate as a member of the board in any FirstNet activity that will affect your financial interests or those of your spouse, minor child, or a non-Federal employer (including an entity in which you serve as an officer or director), unless the interest is of minimal value (\$15,000 or less in securities traded on a U.S. exchange) or is covered by a conflict of interest waiver.

Personal Relationships

2. You may not participate in any FirstNet activity in which one of the parties is someone with whom you have a close personal or business relationship, including an organization in which you are an active member in your personal capacity or someone that was recently (within the prior year) an employer or client.

Outside Activities

3. You may not contact a Federal agency or Federal court regarding a matter involving specific parties on which you participated as a member of the FirstNet board or, if you serve for more than 60 days during a 365-day period, a matter involving specific parties that was pending before the Department of Commerce during your period of service on the board.
4. You may not hold a position with or work for a foreign government, including an international organization composed of governments in which the United States is not a member, or serve as a registered foreign agent or provide services requiring registration under the Lobbying Disclosure Act (which means that you may not be a registered lobbyist during your period of service on the FirstNet board).

Gifts

5. You may not accept a gift from anyone who has an interest before the Department of Commerce or that is offered because of your position on the FirstNet board, unless it is:
 - a meal, lodging, transportation, or other benefit offered based on a non-Federal business or employment relationship;
 - a gift offered based on a personal relationship;
 - an invitation to a reception or other widely-attended gathering, if approval is granted (which can be obtained through an ethics official);
 - a meal at which you are speaking;
 - a gift valued at \$20 or less; or
 - otherwise covered by an exception in ethics regulations.

Use of Government Resources

6. You may not use any Government resources for personal purposes, including equipment, supplies, staff time, nonpublic information, and your title as a member of the FirstNet board or the authority of your position.
7. You may not engage in political activities while on Government duty time or on Government premises and you may not use Government resources, including Government-provided access to the internet or an email account, for political purposes.

There are a number of additional rules not contained in this brief summary. More information on ethics laws that apply to you can be obtained from the website of the Ethics Law and Programs Division of the U.S. Department of Commerce – www.commerce.gov/ethics (see the link for Special Government Employees under Rules for Specific Employees).

You should not rely only on these written materials, however. For guidance regarding particular rules or their application to specific situations, contact one of the following ethics attorneys:

Art Warren – awarren@doc.gov – 202-482-5384
David Brodian – dbrodian@doc.gov – 202-482-5207
David Maggi – dmaggi@doc.gov – 202-482-5384
Dana Jacob – djacob@doc.gov – 202-482-5384.

*Prepared by the Ethics Law and Programs Division, Office of the General Counsel,
United States Department of Commerce – 202-482-5384 – ethicsdivision@doc.gov –
June 23, 2015*