

National Aeronautics and  
Space Administration

**Headquarters**

Washington, DC 20546-0001



December 7, 2005

Reply to Attn of:

**General Law Practice Group**

**TO:** Distribution

**FROM:** Alternate Designated Agency Ethics Official

**SUBJECT:** Determination Regarding Attendance by NASA Employees at EADS North America Holiday Reception, December 8, 2005

On December 8, 2005, EADS North America (EADS) will host its annual holiday reception at the Stephen Decatur House in Washington, DC. Approximately 400 individuals have been invited to attend. The event will be widely attended by officials from other Federal agencies, members of Congress and their staffs, representatives from the aerospace industry and various aerospace associations, the media, and academia. The estimated cost of the standup reception, which includes all food and beverages, is \$125 per person. The host intends to give to each attendee a wine opener with a small booklet valued at \$8.00. This gift, which is under the \$20 exception, can be accepted by Federal employees if they have not met the \$50 cap on gifts from EADS in a calendar year. The reception will allow NASA employees the opportunity to discuss with other guests the accomplishments and progress of the Space program as well as other aspects of common interest.

I find that this event meets the requirements of "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is Agency interests in having NASA personnel attend the event. Accordingly, NASA employees whose duties do not substantially affect EADS, may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

NASA employees whose duties may substantially affect EADS, such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "R. Andrew Falcon". The signature is stylized and includes a long horizontal stroke extending to the right.

R. Andrew Falcon