

National Aeronautics and  
Space Administration

**Headquarters**

Washington, DC 20546-0001



December 22, 2005

Reply to Attn of

**General Law Practice Group**

**TO:** Distribution

**FROM:** Alternate Designated Agency Ethics Official

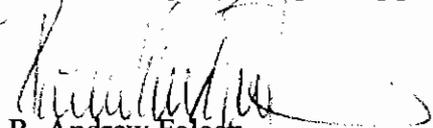
**SUBJECT:** Determination Regarding Attendance by NASA Employees at a Dinner Presentation Hosted by Lockheed Martin (ILS) on January 5, 2006

On the evening of January 5, 2006, the International Launch Services, Inc. (ILS), on behalf of Lockheed Martin Commercial Launch Services, Inc. (LMCLS), will host a dinner presentation. Dr. John D. Graham, the Administrator of the Office of Information and Regulatory Affairs for the Office of Management and Budget will be the guest speaker. The subject of the presentation is the "Application of Public Policy Analysis within the Office of Information and Regulatory Affairs." The presentation will be followed by a period of general discussion.

The dinner presentation will be widely attended by individuals from a broad spectrum of industry and government organizations, including many current and former Rand Graduate School students. Approximately 180 individuals have been invited. The estimated cost of the event, which includes all food and beverages, is approximately \$60.00 per person. The dinner will allow individuals from a broad spectrum of industry and government to exchange ideas on the operation of the U.S. government and the implications for industry.

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

NASA employees whose duties may substantially affect Lockheed Martin, 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.

  
R. Andrew Falcon