



June 28, 2006

Reply to Attn of: **General Law Practice Group**

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Blanket approval for Headquarters Senior Institutional and those with Project Responsibilities to Attend a Pre-launch Reception Co-sponsored by NASA Stennis Space Center and Pratt-Whitney Rocketdyne

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

NASA Headquarters employees have been invited to attend a pre-launch reception co-sponsored by NASA SSC and Pratt-Whitney Rocketdyne ("PWR") at the Hilton Hotel, Cocoa Beach, Florida, Friday, June 30, 2006, from 7:00 p.m. to 9:00 p.m. This event is to be held in conjunction with the launch of STS-121, at the Kennedy Space Center.

This event will be a widely-attended gathering of aerospace industry representatives, and Federal and State elected officials. The refreshments, which will be provided by PWR, are valued at \$16 per person. Approximately 150 individuals have been invited to attend the reception. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

PWR is a contractor company that is currently involved in contractual matters relating to NASA. Some Headquarters personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to PWR's business interests. The invited personnel include the following: the Administrator, the Deputy Administrator, the Associate Administrator, the Assistant Associate Administrator, the Chief of Staff, the White House Liaison/Deputy Chief of Staff, the Chief of Safety and Mission Assurance, the Associate Administrators for ARMD, ESMD, SMD, and SOMD, the Chief of Strategic Communications, the Assistant Administrator for Legislative Affairs, and the Assistant Associate Administrator for the Space Shuttle Program. These employees are similarly situated in that they each have senior institutional or project responsibilities that could significantly influence current or future Pratt-Whitney Rocketdyne contracts.

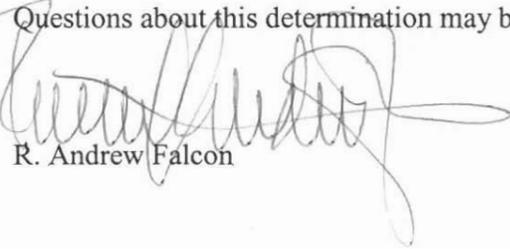
I have determined that free attendance of these senior institutional and project leaders at the pre-launch reception is in the interests of the agency because it will further agency

programs and operations. This event is co-sponsored by SSC and the attendance of these senior NASA employees at the event will help to raise NASA's profile with national, state, and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information concerning its activities.

The total per-person cost for the event is estimated at \$16. Given the purpose of the event, the alignment of the pre-launch reception's interests with NASA's, the broad attendance anticipated, and the modest market value of these social events, I have determined that the value to the agency in having these senior institutional and project leaders attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA employees in the positions identified above may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. Free attendance by employees whose duties do not substantially affect the sponsors is addressed in a separate determination.

Questions about this determination may be addressed to Katie Spear at 202-358-0394.



R. Andrew Falcon