National Aeronautics and
Space Administration
Headquarters
Washington, DC 20546-0001

July 14, 2006

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Approval for NASA Employees with Senior Institutional or Project Responsibilities to Attend a Series of Events in Conjunction with the Farnborough International Airshow

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

A number of NASA employees with senior institutional or project responsibilities have been invited to attend the Farnborough International Airshow and a number of events collateral to the Airshow. The events are sponsored by Farnborough International Ltd., the Society of Japanese Aerospace Companies, the Aerospace Industries Association, a number of public and private entities from the State of Alabama,[1] Accenture, Finmeccanica, the Space Foundation, Korn/Ferry, Aerojet, BAE Systems, The Boeing Company, Crane Aerospace, General Electric, General Atomics Aeronautical Systems, Inc., Honeywell, Lockheed Martin Corporation, Northrop Grumman Corporation, Raytheon, Sikorsky Aircraft, United Technologies Corporation, and Textron, Inc. In a separate determination, I found that the events meet the requirements of "widely attended gatherings" as defined in 5 CFR §2635.204(g)(2) and that those whose duties do not substantially affect the sponsors may accept free attendance.

Many of the event sponsors are contractor companies or associations whose members are comprised of such companies that are currently involved in aeronautics programs and contractual matters relating to NASA. Some NASA personnel attending this event have duties that may substantially affect the interests of the event sponsors.[2] These personnel

[1] The sponsors include the Alabama Economic Development Office, Alabama Electric Cooperative Inc., Alabama Power Company, the Chamber of Commerce for Huntsville/Madison County, the City of Mobile, Dothan Regional Airport, Elmore County Economic Development, Huntsville International Airport, the Madison County Commission, the Mobile Airport Authority, the Mobile Chamber of Commerce, and the Tennessee Valley Authority.

[2] These personnel include the Administrator, the Chief of Staff, the Associate Administrator for Aeronautics Research, the Deputy Associate Administrator for Aeronautics Research, the Senior Strategist for ARMD, a Senior Technical Advisor for ARMD, the Assistant Administrator for External Relations, the Deputy Assistant Administrator for External Relations, the Director of the Exploration Systems and Aeronautics Research Division in External Relations, the Deputy Program Director for Aviation Safety, the

are similarly situated in that they each have senior institutional or project responsibilities that could significantly influence current or future matters with these entities.

I have determined that free attendance of these senior institutional and project leaders at the various events is in the interests of the Agency because it will further Agency programs and operations. The events allow discussions regarding NASA's Vision and its current and future aerospace programs with a wide variety of domestic and international partners. The events will help to raise NASA's profile in the international community and will support NASA's statutory mandate to disseminate information concerning its activities.

The total per-person cost for the nine events combined is estimated at a maximum of $835. Given the purpose of the events, the unique opportunity the events provide to communicate with the international and domestic aerospace communities, the broad attendance anticipated, and the modest market value of these events considering the foreign location, I have determined that the value to the agency in having these senior institutional and project leaders attend the events 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.

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

R. Andrew Falcon

Deputy Program Director for the Aeronautics Test Program, the Principal Investigator for the Subsonic Fixed Wing Program, the NASA European representative, and an International Programs Specialist.