National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

December 18, 2006

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Blanket Determination Regarding Attendance by NASA Employees at the Space Transportation Association (STA) Breakfast, December 19, 2006

On December 19, 2006, the Space Transportation Association (STA) will host and sponsor a breakfast at the Monocle restaurant, 107 D Street, Washington, DC. Members of the STA include Aerojet, ATK, Boeing, Lockheed Martin, Northrup Grumman, and United Space Alliance. STA's focus is on ensuring reliable cost effective space launch services for NASA, DoD and the commercial market. Lou Rains, an Editor and Vice President of Space News, is the featured speaker and will provide his "Year End Space Scorecard," a discussion of events that occurred in the Space community in 2006.

The breakfast will be attended by representatives of the aerospace industry, trade associations, congressional staffers, and Federal agencies. Approximately 45-50 people are expected to attend. The estimated cost of the breakfast, which includes all food and beverages, is $27.00 per person. I find that the STA 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. Attendance at the reception will allow NASA representatives to discuss the Vision for Space Exploration and NASA programs with the other attendees. Accordingly, NASA employees whose duties do not substantially affect STA may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

NASA employees whose duties may substantially affect STA or its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

R. Andrew Falcon