

National Aeronautics and  
Space Administration



**NASA Management Office**

180-200  
Jet Propulsion Laboratory  
4800 Oak Grove Drive  
Pasadena, CA 91109-8099

Reply to All of:

Office of Chief Counsel

September 12, 2007

TO: File

FROM: Deputy Ethics Official

SUBJECT: Determination Regarding Attendance at "Fifty Years in Space"

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

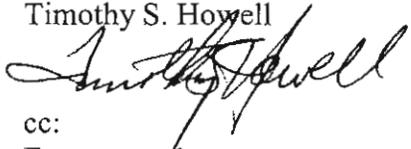
On September 19-21, 2007, the California Institute of Technology (Caltech), Graduate Aeronautical Laboratories, Northrop Grumman Space Technology, and the Jet Propulsion Laboratory division of Caltech will sponsor a celebration of the 50<sup>th</sup> anniversary of space exploration on the campus of Caltech (lectures, meals and refreshments) and at the Pasadena Ritz Carlton Hotel (reception and Conference Banquet). No Government funds will be expended in holding the event, which is open to the public.

The event will be a widely-attended gathering of academia (students and faculty), industry, representatives from national laboratories, and national and local media. Presenters will include the NASA Administrator, former astronauts and a Nobel laureate; representatives from large and small aerospace industries, state, federal, and international governmental agencies; and several participants from academia. The panel discussion will be moderated by the Chief Technology and Environment Correspondent of CNN. Registration for the full event is \$550, but to encourage a broader mix of attendees, and particularly Caltech/JPL employees, Caltech students and NASA Management Office (NMO) personnel, a limited number of seats (500) have been made available at no cost for the lectures only (no meals, no refreshments). These no-cost seats were made available on a first come, first served basis, as determined by telephone registration. All such seats now have been claimed, including one or more registrations by NASA Management Office employees. The incremental cost of attendance at the lectures only is negligible, and tickets for just the lectures are not available to establish a market value for such attendance. Ample opportunity for exchanges of differing views will be afforded during the panel discussions, before and after the lectures, and during breaks between lectures. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g)(2).

Some NASA Management Office personnel could have duties that may substantially influence current or future contracts or business interests of the co-sponsors.

permitted, but I am informed that the sponsor's invitation for free lecture attendance does not include free refreshments at the breaks, and NMO employees must honor that restriction.

Timothy S. Howell



cc:

Event attendees

Office of the General Counsel

Ms. Dawn A. Feick