

National Aeronautics and  
Space Administration  
John H. Glenn Research Center  
Lewis Field  
Cleveland, OH 44135-3191



November 20, 2007

Reply to Attn of: Office of Chief Counsel

TO: Distribution

FROM: Deputy Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at an STS-122  
Pre-Launch Reception

On December 5, 2007, the Artic Slope Regional Corporation (ASRC), will host a pre-launch reception in anticipation of the STS-122 launch. The event held at the Double Tree Hotel in Cocoa Beach Florida, 2028 N. Atlantic Avenue, will begin at 6:00 p.m. and conclude at 8:00 p.m. Approximately 100 people are expected to attend, including representatives from industry, the Executive and Legislative Branches of the U.S. Government, state officials, NASA, and other Federal employees. ASRC will provide food and beverages at a cost of approximately \$30 per person.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest having the attendance of the event by NASA personnel. The event will allow NASA employees to discuss the NASA Vision for Space Exploration, the Space Shuttle program, and the STS-122 mission with the other attendees. Accordingly, NASA employees whose duties do not substantially affect the industry co-sponsors may accept an invitation for free attendance at the reception.

NASA employees whose duties may substantially affect these co-sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their ethics counselor.

In addition, ASRC may give each attendee a small polar bear valued at less than \$5.00 each. Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion. Accordingly, in addition to accepting free attendance at the event, NASA employees may accept the polar bear. NASA invitees are reminded not to exceed the \$50 cap on gifts from one source in a calendar year.

A handwritten signature in black ink, appearing to read "J. William Sikora".

J. William Sikora  
Chief Counsel  
Glenn Research Center