National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

January 23, 2008

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Ethics Official

SUBJECT: Blanket Determination Regarding Attendance by NASA Employees at the National Space Club Luncheon on February 7, 2008

The National Space Club will hold a luncheon on February 7, 2008, at the Top of the Hill of the Reserve Officer's Association at One Constitution Avenue, NE, Washington, DC from 11:30 a.m. to 1:00 p.m. The National Space Club was founded in 1957 to stimulate the exchange of ideas and information about rocketry and astronautics and to promote the recognition of America's achievements in aerospace. The Club is a nonprofit corporation composed of representatives of industry, government, educational institutions and private individuals.

This event will be a widely attended gathering of 200 people, including representatives of industry, Federal agencies, Congressional staff, and private individuals. The estimated cost of the luncheon, which includes all food and beverages, is $75 per person. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I have determined that free attendance of NASA employees is in the best interests of the Agency because it will further NASA programs and operations. Dr. Michael Griffin, the NASA Administrator, is the guest speaker and will be discussing the NASA budget and its impact on core Agency missions and programs. The luncheon will also give NASA employees the opportunity to discuss these issues and the Vision for Space Exploration with other attendees. Accordingly, NASA employees whose duties do not substantially affect the event sponsor or a majority of all of its members may accept an invitation for free attendance to the event for themselves and their invited spouses or guests.

Note that some NASA contractors may be providing sponsorship for this event and purchasing tables at which the National Space Club may seat other attendees. To avoid the appearance of a conflict of interest, NASA employees who attend the luncheon must ensure that they do not sit at a table sponsored by a contractor with which they are closely and currently involved or expect to be involved within the next few months, e.g., by way of source selection or contract administration duties.

It will be sufficient if invited NASA employees provide the names of such contractors to the National Space Club with their RSVPs, registration, or other correspondence and do not sit at the listed companies' tables. (A list of the National Space Club's corporate members is enclosed for reference. It is likely that some of the event sponsors will be entities found on this list.) Employees do not have to list any and all contractors with whom future contact is possible, or contractors with whom they have infrequent contacts on trivial matters. Rather, only contractors with whom they are or will soon be closely involved as described above need be listed. Consequently, it is expected that for most employees, the list of prohibited sources can be kept to a minimum. The final decision on this matter is, of course, left to the employee who has first-hand knowledge of his or her responsibilities.

However, NASA employees whose duties may substantially affect the event sponsor or a majority of its members, 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 local ethics counselor.

Adam F. Greenstone

Enclosure

Corporate Membership Inquiry

Individual Membership Application

Corporate Members

2006-2007 Corporate Members

The Corporate Members of the National Space Club represent the entire range of companies involved in space activity, from the smallest to the giants of the aerospace industry. You may find more information about each of these companies on their web sites, by following the links provided.

Accenture, LLP
Aerojet
The Aerospace Corporation
Air Products and Chemicals, Inc.
ASRC Aerospace Corporation
Assurance Technology Corporation
ATK
AXA Space
BAE Systems
Ball Aerospace & Technologies Corp.
The Boeing Company
Booz Allen Hamilton
Computer Sciences Corporation
GeoEye
General Dynamics
Global Science & Technology
Goodrich Corporation
Harris Corporation
Honeywell
Integrity Applications Incororated
International Space Brokers, Inc.
ITT
Jackson and Tull
L-3 Titan Group
Lockheed Martin Corporation
ManTech International Corporation
Northrop Grumman Corporation
Orbital Sciences Corporation
QSS Group, Inc.
Raytheon Company
Science Applications International Corporation
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SpaceVest
Swales Aerospace
Teledyne Brown Engineering
United Space Alliance

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