National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

March 7, 2008

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Approval for Headquarters Employees with Senior Institutional or Project Responsibilities to Attend a Post-launch Reception Sponsored by Pratt-Whitney Rocketdyne

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

Certain Headquarters employees with senior institutional or project responsibilities with regard to the Space Shuttle Program, External Tank Project, and Constellation Program have been invited to attend a post-launch reception sponsored by Pratt & Whitney Rocketdyne at the Hilton Cocoa Beach Oceanfront Hotel, Cocoa Beach, Florida, on or about Tuesday, March 11, 2008, from 4 a.m. to 8 a.m. This event is to be held in conjunction with the launch of STS-123, at the Kennedy Space Center.

This event will be a widely-attended gathering of aerospace industry representatives, members of Congress, NASA employees, and members of the public. The reception is valued at $35 per person and approximately 300 individuals have been invited to attend. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

Pratt-Whitney Rocketdyne is a contractor company that is currently involved in the Space Shuttle program, the Constellation program, and other significant contractual matters relating to NASA. Some Headquarters personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to Pratt & Whitney Rocketdyne's business interests.[1] These personnel are similarly situated in that they each have senior institutional or project responsibilities that could significantly influence current or future Pratt &Whitney Rocketdyne contracts.

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[1] These personnel include the NASA Administrator, the Deputy Administrator, the Associate Administrator, the Associate Administrator for Space Operations, Assistant Associate Administrator for Space Shuttle, Deputy Associate Administrator for Program Integration, the Chief of the Safety and Mission Assurance Office, Associate Administrator for Security & Program Protection, Assistant Administrator for Legislative & Intergovernmental Affairs, and Assistant Administrator for Public Affairs

I have determined that free attendance of these senior institutional and project leaders at the post-launch reception is in the interests of the agency because it will further agency programs and operations. The attendance of these senior NASA employees at the event will help to raise NASA's profile with national and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the modest market value of the event, I have determined that the value to the agency in having these senior institutional and project leaders attend this event 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. Free attendance by employees whose duties do not affect Pratt & Whitney Rocketdyne is addressed in a separate determination.

Questions about this determination may be addressed to Adam Greenstone at 202-358-1775.

Adam F. Greenstone