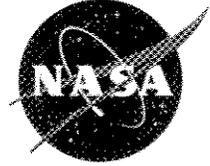


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



May 12, 2008

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the California Space Day Luncheon on May 13, 2008

The California Space Authority (CSA) will hold a California Space Day luncheon on May 13, 2008, at the Hyatt Regency in Sacramento, California. Shana Dale, the NASA Deputy Administrator, will be the guest speaker at the luncheon and will present a speech on NASA similar to the one she is delivering at the NASA Future Forum the next day. The CSA is a non-profit corporation representing defense/homeland security interests of California's diverse space enterprise community. Space Day is an opportunity for space enterprise stakeholders to meet and discuss space policy and regulatory issues with state officials.

This event will be a widely attended gathering of several hundred people, including representatives of industry, state and Federal agencies, and senior members of California's government. Participation by NASA personnel will be limited to the luncheon and will not include any lobbying activities that may take place the rest of the day. 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 at the luncheon is in the best interests of the Agency because it will further NASA programs and operations. The luncheon will give NASA employees the opportunity to discuss NASA's Constellation Program and highlight America's future plans for space exploration. 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.

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.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone