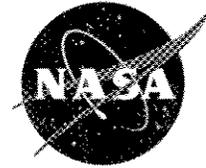


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



May 27, 2008

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at an STS-124 Pre-Launch Reception hosted by ATK

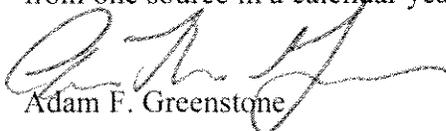
NASA invitees, accompanied by their spouse or a guest, may attend a pre-launch reception sponsored by ATK at the Doubletree Hotel, Cocoa Beach, Florida, on or about May 30, 2008, from 7:00 p.m. – 9:00 p.m. This event is to be held in conjunction with the launch of STS-124 at the Kennedy Space Center.

This event will be a widely-attended gathering of approximately 200 people to include members of Congress and their staffers, state and local officials, members of academia, industry representatives, and employees of NASA and other federal agencies. The cost of the event will be approximately \$20 per person. I find that the reception meets the requirements of a “widely attended gathering” as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event. The event will allow NASA employees to discuss the NASA Vision for Space Exploration, the Space Shuttle program, and the STS-124 mission with the other attendees. Accordingly, NASA employees whose duties do not substantially affect the sponsor may accept an invitation for free attendance at the reception. They may also accept invitations for accompanying spouses or guests.

NASA employees whose duties may substantially affect ATK, 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.

In addition, ATK may give each attendee a key chain valued at less than \$10 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 this memento. NASA invitees are reminded not to exceed the \$50 cap on gifts from one source in a calendar year.


Adam F. Greenstone