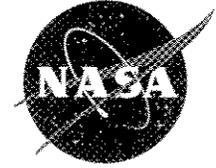


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



June 17, 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 the Space Transportation Association (STA) Lunch, June 17, 2008

On June 17, 2008, the Space Transportation Association (STA) will sponsor a luncheon at the Monocle restaurant in Washington, D.C. Members of the STA include Lockheed Martin and Wyle. STA's focus is on ensuring reliable cost effective space launch services for NASA, DoD, and the commercial market.

The luncheon will be attended by representatives of the aerospace industry, Congressmen, Congressional staffers, the media, NASA, DoD, White House, and FAA. Approximately 300 people have been invited, which includes 30 Federal employees from NASA. The estimated cost of the luncheon, which includes all food and beverages, is \$25.00 per person. I find that the STA 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 in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the luncheon will allow NASA representatives discuss NASA's programs and plans, and to discuss the Vision for Space Exploration with the other attendees. Accordingly, NASA employees whose duties do not substantially affect STA or a majority of all of its members may accept an invitation for free attendance at the luncheon.

NASA employees whose duties may substantially affect STA or its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(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