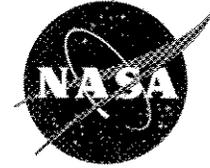


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



July 3, 2008

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Designee

SUBJECT: Blanket Determination Regarding Attendance at Events Related to the Farnborough International Airshow, July 14-20, 2008

Representatives from NASA have been invited to attend a series of events in conjunction with the Farnborough International Airshow 2008. I have determined it to be in the best interest of the Government for those NASA employees who are invited to these events to attend in their official capacities and as representatives of NASA. The events are as follows:

1. Farnborough International Airshow, July 14-20, 2008: Farnborough International Ltd., the host of the event and a subsidiary of the Society of British Aerospace Companies, has offered to sponsor some of the admission fees for the Airshow in Farnborough, England. Approximately 200,000-250,000 people are expected to attend. The maximum benefit per employee would be approximately \$40.00 per day or \$120.00 total. The Airshow brings many different groups together, including foreign and domestic government and industry representatives.
2. Reception Hosted by Louis R. Chenevert, July 13, 2008: Mr. Chenevert, the Chief Executive Officer and President of United Technologies Corporation, is hosting this event at the British Museum in London. The event is sponsored by Pratt and Whitney, Sikorsky Aircraft, and Hamilton Sundstrand. Approximately 200 people will attend, and 15 of the invitees are from NASA. The attendees will include U.S and U.K. officials from academia, government, and industry. Refreshments will be served at a cost of approximately \$45.00 per person.
3. Business Performance meeting and reception, July 13, 2008: This meeting on how to improve business performance through the power of information is sponsored by EDS and will be held at the Exhibitors Club in London. Approximately 100 people will attend and 10 of the invitees are from NASA. The attendees will include U.S. and U.K. officials from academia, government and industry. Refreshments will be served at a cost of approximately \$36.00 per person.
4. U.S. Ambassador's Reception, July 13, 2008: The U.S. Ambassador to Britain is hosting this reception at 7:30 p.m. in the Winfield House in London. It is sponsored by the Aerospace Industries Association (AIA) with contributions from 13 aerospace companies -

Aerojet, BAE Systems, The Boeing Company, Crane Aerospace, General Electric, General Atomics Aeronautical Systems, Inc., Lockheed Martin Corporation, Northrop Grumman Corporation, Raytheon, Sikorsky Aircraft, United Technologies Corporation, and Textron, Inc. Approximately 50 people will attend and 7 of the invitees are from NASA. The attendees will include U.S and U.K. officials from academia, government, and industry. Refreshments will be served at a cost of approximately \$60.00 per person.

5. Finmeccanica Reception, July 15, 2008: Finmeccanica, an Italian corporation, is sponsoring a reception at 7:00 p.m. at the National Gallery in London. Approximately 150 people are expected to attend and 15 of the invitees are from NASA. The attendees will include U.S. and U.K. officials from academia, government, and industry. Refreshments will be served at a cost of approximately \$40.00 per person.

6. AIA VIP/President's Representative dinner, July 13, 2008: The Aerospace Industries Association is sponsoring a dinner at 7:30 p.m. at the Marriott Grosvenor Hotel in London. Approximately 50 people are expected to attend and 5 of the invitees are from NASA. The attendees will include U.S. and U.K. officials from academia, government, and industry. Refreshments will be served at a cost of approximately \$128.00 per person.

7. Society of Japanese Aerospace Companies reception, July 16, 2008: The Society of Japanese Aerospace Companies, a Japanese non-profit association, is sponsoring a dinner beginning at 6:00 p.m. at the Marriott Grosvenor Hotel in London. Approximately 100 people are expected to attend and 10 of the invitees are from NASA. The attendees will include U.S. and U.K. officials from academia, government, and industry. Refreshments will be served at a cost of approximately \$40.00 per person.

8. State of Alabama reception, July 16, 2008: A number of public and private entities in Alabama are sponsoring a reception at 7:00 p.m. in the Orangery at Kensington Palace. The sponsors include Alabama Economic Development Office, Alabama Electric Cooperative, Inc., Alabama Power Company, the Chamber of Commerce for Huntsville/Madison County, the City of Mobile, Dothan Regional Airport, Elmore County Economic Development, Huntsville International Airport, the Madison County Commission, the Mobile Airport Authority, the Mobile Chamber of Commerce and the Tennessee Valley Authority. Approximately 150 people are expected to attend and 10 of the invitees are from NASA. The attendees will include U.S. and U.K. officials from academia, government, and industry. Refreshments will be served at a cost of approximately \$80.00 per person.

9. Farnborough International Air Show reception, July 17, 2008: Farnborough International Ltd. and Accenture are sponsoring a reception at 6:30 p.m. at the Honourable Society of Lincoln's Inn in London. Approximately 200 people are expected to attend and 15 of the invitees are from NASA. The attendees will include U.S. and U.K. officials from academia, government, and industry. Refreshments will be served at a cost of approximately \$115.00 per person.

10. Korn/Ferry Reception, July 19, 2008: Korn/Ferry, a U.S. aerospace corporation, is sponsoring a reception at 6:30 p.m. at the Spencer House in London. Approximately 200

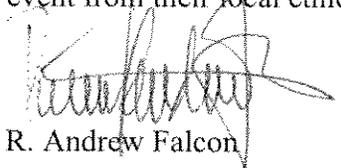
people are expected to attend and 15 of the invitees are from NASA. The attendees will include U.S. and U.K. officials from academia, government, and industry. Refreshments will be served at a cost of approximately \$40.00 per person.

11. Space Foundation Dinner, July 19, 2008: The Space Foundation, Lockheed Martin, Northrop Grumman and The Boeing Company are sponsoring this dinner at 6:30 p.m. at the Savoy Hotel in London. Approximately 40 people are expected to attend and 4 of the invitees are from NASA. The attendees will include U.S. and U.K. officials from academia, government, and industry. Refreshments will be served at a cost of approximately \$115.00 per person.

12. Gala Reception on the Thames aboard the Silver Sturgeon River Cruise, July 14, 2008: This River Cruise reception is sponsored by Bell Helicopter Textron, Inc. Approximately 50 people are expected to attend and 4 of the invitees are from NASA. The attendees will include U.S. and U.K. officials from academia, government, and industry. Refreshments will be served at a cost of approximately \$100.00 per person.

13. AIA India Reception, July 14, 2008: This reception is sponsored by the Indian Space Research Organisation, and will be held at 5:30 p.m. at the Mayfair Hotel in London. The Indian Space Research Organisation is part of the Government of India's Space Commission and Department of Space. Approximately 100 people are expected to attend and 10 of the invitees are from NASA. The attendees will include U.S. and U.K. officials from academia, government, and industry. Refreshments will be served at a cost of approximately \$50.00 per person.

I find that these events meet the requirements of a widely attended gatherings as defined in 5 CFR 635.204(g). Because of NASA's interest in international collaboration and in the advancement and application of flight and related technologies, I conclude that NASA employees whose duties do not substantially affect the industry sponsors may accept an invitation for free attendance at these events. NASA employees, whose duties may substantially affect these co-sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR §2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

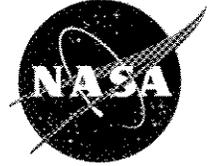


R. Andrew Falcon

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



July 3, 2008

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Designee

SUBJECT: Approval for NASA Employees with Senior Institutional or Project Responsibilities to Attend a Series of Events in Conjunction with the Farnborough International Airshow

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

A number of NASA employees with senior institutional or project responsibilities have been invited to attend the Farnborough International Airshow and a number of events collateral to the Airshow. The events are sponsored by Farnborough International Ltd., the Society of Japanese Aerospace Companies, the Aerospace Industries Association, a number of public and private entities from the State of Alabama,<sup>1</sup> Accenture, Finmeccanica, Korn/Ferry, Aerojet, BAE Systems, The Boeing Company, Crane Aerospace, EDS, General Electric, General Atomics Aeronautical Systems, Inc., Hamilton Sundstrand, Indian Space Research Organisation, Lockheed Martin Corporation, Northrop Grumman Corporation, Pratt and Whitney, Raytheon, Sikorsky Aircraft, United Technologies Corporation, the Space Foundation, and Textron, Inc. In a separate determination, I found that the events meet the requirements of "widely attended gatherings" as defined in 5 CFR §2635.204(g)(2) and that those whose duties do not substantially affect the sponsors may accept free attendance.

Many of the event sponsors are contractor companies or associations whose members are comprised of such companies that are currently involved in aeronautics programs and contractual matters relating to NASA. Some NASA personnel attending this event have duties that may substantially affect the interests of the event sponsors.<sup>2</sup> These personnel

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<sup>1</sup> The sponsors include the Alabama Economic Development Office, Alabama Electric Cooperative Inc., Alabama Power Company, the Chamber of Commerce for Huntsville/Madison County, the City of Mobile, Dothan Regional Airport, Elmore County Economic Development, Huntsville International Airport, the Madison County Commission, the Mobile Airport Authority, the Mobile Chamber of Commerce, and the Tennessee Valley Authority.

<sup>2</sup> These personnel include the Administrator, the Chief of Staff, the Assistant Administrator for External Relations, the Assistant Administrator for Public Affairs, Deputy Assistant Administrator of Strategic Partnerships, NASA European Representative, Associate Administrator, Aeronautics Research Mission Directorate, Mission Support Manager for ARMD, Special Assistant to the Associate Administrator,

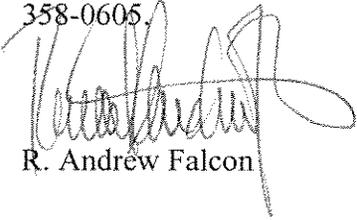
are similarly situated in that they each have senior institutional or project responsibilities that could significantly influence current or future matters with these entities.

I have determined that free attendance of these senior institutional and project leaders at the various events is in the interests of the Agency because it will further Agency programs and operations. The events allow discussions regarding NASA's Vision and its current and future aerospace programs with a wide variety of domestic and international partners. The events will help to raise NASA's profile in the international community and will support NASA's statutory mandate to disseminate information concerning its activities.

The total per-person cost for the thirteen events combined is estimated at a maximum of \$969.00. Given the purpose of the events, the unique opportunity the events provide to communicate with the international and domestic aerospace communities, the broad attendance anticipated, and the modest market value of these events considering the foreign location, I have determined that the value to the agency in having these senior institutional and project leaders attend the events 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.

Questions about this determination may be addressed to Catherine Donovan on (202) 358-0605.



R. Andrew Falcon