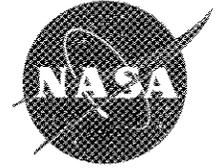


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



July 16, 2008

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Widely Attended Gathering Determination STS-124 Reception
Sponsored by United Space Alliance (USA)

On July 16, 2008, USA will host a reception in conjunction with a presentation by the crew of STS-124. The event will be held in the Rayburn House Office Building (B-339).

USA states that all Members of Congress and interested staff will be invited, and 200 to 300 people are expected to attend the event. Other than NASA, no other Federal executive branch employees will be invited. USA has obtained corporate support, to date, from UTC, Lockheed Martin, Honeywell, and ATK. The cost of the food and refreshments to be provided at the reception will be approximately \$45 per person, though by corporation, the amount is \$3-4 per capita. 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 is in the best interests of the Agency because it will further NASA programs and operations. It would provide an informal opportunity for NASA astronauts, officials, and staff to confer and discuss the mission and future Shuttle missions with members of Congress and key Congressional staff, industry representatives, and other attendees.

Accordingly, NASA employees whose duties do not substantially affect USA may accept an invitation for free attendance to the event for themselves and their invited spouses or guests. NASA employees whose duties may substantially affect USA, 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