

National Aeronautics and
Space Administration
Goddard Space Flight Center
Greenbelt, MD 20771



September 12, 2008

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at
Goddard LaunchFest Breakfast

On the morning of September 13, 2008, the American Institute for Aeronautics and Astronautics (AIAA) is sponsoring, and NASA Goddard is hosting, a breakfast at NASA Goddard Space Flight Center. The purpose of the breakfast is to kick-off LaunchFest, an event open to the public to educate and disseminate information to the public about upcoming Goddard science missions and the wide variety of science and technology being researched and developed at Goddard.

Approximately 110 people are expected to attend the breakfast, representing NASA, local governments, universities, industry, and the Japanese Space Agency. The estimated cost per person for the breakfast is \$33.

Attendance at the breakfast will allow NASA employees an opportunity to discuss issues of interest to the scientific community, including NASA research and discoveries, with other attendees from local governments, universities, and industry. I therefore conclude that NASA's interest in its employees attending this event outweighs any concern that free attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Accordingly, NASA employees whose duties do not substantially affect AIAA or a majority of its members may accept an invitation for free attendance to the breakfast for themselves and their guests.

NASA employees whose duties substantially affect AIAA or a majority of its members, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Robert M. Stephens", with a horizontal line extending to the right from the end of the signature.

Robert M. Stephens