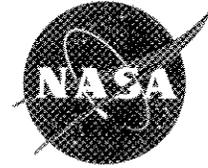


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



October 30, 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 United Space Alliance 2008 Holiday Luncheon on December 4, 2008

On December 4, 2008, United Space Alliance (USA) is hosting its 2008 Holiday Luncheon at the Columbus Club, Union Station, Washington, DC. Approximately 400 individuals have been invited and approximately 150-175 people are expected to attend. The event will be widely attended by Congressional Members and staffers, industry executives and representatives, and Executive Branch employees, including some from the Office of Science and Technology Policy, and the Office of the Vice President and NASA. The estimated cost of the luncheon, which includes all food and beverages, is approximately \$45 per person.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event. The luncheon will allow NASA employees the opportunity to discuss with other guests the accomplishments and progress of the Space program, the International Space Station Program, and the Constellation Program as well as other aspects of common interest. Accordingly, NASA employees whose duties do not substantially affect USA may accept an invitation for free attendance to the luncheon.

NASA employees whose duties may substantially affect USA, 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.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone