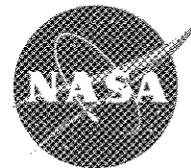


National Aeronautics and  
Space Administration  
**Headquarters**  
Washington, DC 20546-0001



November 6, 2008

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at an STS-126 Launch Reception hosted by United Space Alliance, Lockheed Martin, and the Boeing Company

On November 13, 2008, United Space Alliance (USA), Lockheed Martin, and the Boeing Company (sponsors) will host and sponsor a reception and opportunity to view the launch of the STS 126. The event will be held from approximately 8:00 p.m. to 10 p.m., and will take place at the Hilton Cocoa Beach hotel, in Florida.

The sponsors intend that the event will be a widely-attended gathering, with approximately 400 representatives of the aerospace industry, trade associations, and other federal agencies invited to attend. Approximately 40 NASA employees have been invited. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event. The per person amount is also within the gift acceptance threshold. The event will allow NASA employees to discuss the Space Shuttle, International Space Station, and Constellation Programs with the other attendees. Accordingly, NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance at the reception.

NASA employees whose duties may substantially affect the sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 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