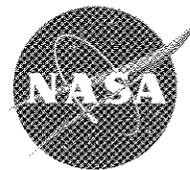


National Aeronautics and  
Space Administration  
**Headquarters**  
Washington, DC 20546-0001



November 24, 2008

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at Symposium including Breakfast and Reception Hosted by George Washington University, on December 9, 2008

On December 9, 2008, at the Jack Morton auditorium on the campus of George Washington University (GW), the Space Policy Institute (within the Elliot School of International Affairs) will host a symposium entitled, "Space Policy in Transition." GW notes that Lockheed Martin has provided general sponsorship of the event, and that the Boeing Company will be hosting breakfast, refreshments, and post-event reception. Lunch must be paid for by the individual. Invited and expected to attend are Congressional staff, current and former senior NASA and DoD officials, representatives from other public and private space programs.

There is no charge for attending the Symposium. However, the gift of the breakfast, refreshments, and the post-event reception value at over \$20, and in an abundance of caution, this determination of attendance is being made. The sponsor of the Symposium is the Space Policy Institute, and not a private company.

The Space Policy Institute "provides a setting in which scholars, policy analysts, practitioners, and students can work together to examine and evaluate options for the future in space. It is an affiliate of the International Space University and The Aerospace Corporation. The Space Policy Institute is directed by Dr. Scott Pace. The Space Policy Institute receives substantial financial support from The George Washington University. In addition, the Institute has received funding from a number of individual, corporate, foundation, and government sources." (Source: <http://www.gwu.edu/~spi/> last visited 11/21/2008 at 3:47 p.m.)

At the Symposium, which will be widely attended by individuals from both the private and public sectors, distinguished speakers will present topics of relevance to the aerospace and government communities. Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the modest market value of the event, I have determined that the value to the agency in having employees attend outweighs any concern that attendance may or may appear to improperly influence them in the performance of their duties, including the free breakfast, refreshments, and reception.

NASA employees whose duties may substantially affect the Space Policy Institute, Lockheed-Martin, or Boeing, 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 "Rebecca Gilchrist". The signature is written in a cursive style with a large initial "R" and a long, sweeping underline.

Rebecca Gilchrist  
Alternate Designated Ethics Official (acting)