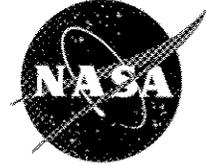


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



January 22, 2009

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at an Boeing's L-2, STS-119 Pre-Launch Reception hosted by United Space Alliance, LLC, and Lockheed Martin on February 10, 2009

NASA invitees, accompanied by their spouse or a guest, may attend a pre-launch reception sponsored by United Space Alliance, LLC (USA), Lockheed Martin (LM), and the Boeing Company on Tuesday, February 10, 2009, from 8:00 p.m. – 11:00 p.m., at the Hilton Hotel, Cocoa Beach, in Florida.

This event will be a widely-attended gathering of approximately 600 representatives of NASA, the aerospace industry, Congress and their staffers, trade associations, academia, and media. The cost of the event will be approximately \$34 per person. 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 event will allow NASA employees to discuss the Space Shuttle Program, the Constellation Program and the International Space Station Program, and the launch of STS-119. Accordingly, NASA employees whose duties do not substantially affect the sponsor may accept an invitation for free attendance at the reception. They may also accept invitations for accompanying spouses or guests.

NASA employees whose duties may substantially affect USA, LM and the Boeing Company, 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", written over a white background.

Adam F. Greenstone