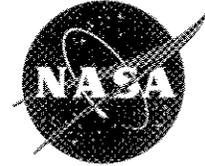


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



February 24, 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 the American Institute of Aeronautics and Astronautics (AIAA) Aerospace Spotlight Awards Gala on May 13, 2009

On May 13, 2009, the AIAA, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host its Aerospace Spotlight Awards Gala at the Ronald Reagan Building and International Trade Center in Washington, D.C., from 6:30p.m.-10:00p.m. The dinner will be widely attended by officials from other Federal agencies, members of Congress and their staffers, academia, industry and aerospace associations.

Approximately 700 individuals have been invited to the dinner. The estimated cost of the dinner, which includes all food and beverages, is \$230 per person. The dinner will allow NASA employees the opportunity to discuss space related issues and concerns with other attendees and to recognize aerospace achievement.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event so that NASA invitees may attend the event without charge. Accordingly, NASA employees whose duties do not substantially affect the sponsor or a majority of its members may accept an invitation for free attendance to the event for themselves and their invited spouses or guests.

NASA employees whose duties may substantially affect AIAA, or a majority of its members such as by way of procurement duties, or who are in non-career positions for which the President's Executive Order of January 21, 2009 requires signing an ethics pledge, 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.


for Adam F. Greenstone