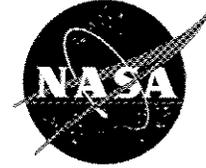


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



March 3, 2009

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

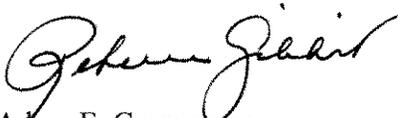
SUBJECT: Determination Regarding Attendance by NASA Employees at a Reception for the Astronaut Crew of STS-131 on March 18, 2009

NASA invitees, accompanied by their spouse or a guest, may attend a reception sponsored by United Space Alliance, LLC (USA), Lockheed Martin (LM), Pratt-Whitney Rocketdyne, and the Boeing Company on March 18, 2009, from 6:00 p.m. –8:00 p.m., at Room 2237 Rayburn House Office Building, in Washington, D. C.

This event will be a widely-attended gathering of approximately 500 representatives of NASA, the aerospace industry, Congress and their staffers, trade associations, academia, and media. The cost of the event will be approximately \$30 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 information on ISS and research. Accordingly, NASA employees whose duties do not substantially affect the event sponsors may accept an invitation for free attendance at the reception for themselves and their spouse or guests. Political appointees, who are in non-career positions for which the President’s Executive Order of January 21, 2009, requires signing an ethics pledge, should pay the fair market value for the reception.

However, NASA employees whose duties may substantially affect event 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.

  
for Adam F. Greenstone