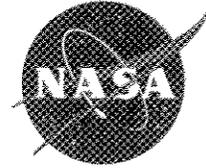


National Aeronautics and Space Administration  
**Headquarters**  
Washington, DC 20546-0001



March 9, 2009

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the Aerospace States Association Dinner (ASA) on March 9, 2009

On March 9, 2009, the Aerospace States Association (ASA), a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a dinner at the Capitol Hill Club, in Washington, D. C., from 5:30 p. m.-8:00 p. m. The sponsor members of the ASA include Rockwell Collins, USRA, and Orbital Sciences Corporation.

The dinner will follow a hearing on Capitol Hill on Science, Technology, Engineering, and Mathematics (STEM) Education, Aviation and Space. This dinner will include approximately 50 people, including government, civil, business, academic and congressional leaders who participated in the hearing. The estimated cost of the dinner, which includes all food and beverages, is \$75.00 per person.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is an Agency interest in NASA personnel attending the event. This dinner will afford an opportunity for the attendees to exchange information on STEM education, aviation, and space. Accordingly, NASA employees whose duties do not substantially affect the event sponsors may accept an invitation for free attendance to the dinner.

However, NASA employees whose duties may substantially affect ASA, or 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 Rebecca Greenstone*  
Adam F. Greenstone