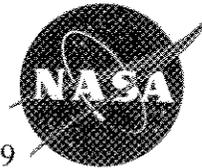


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



April 1, 2009

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the ASTM International Board of Directors Meeting on April 28, 2009

On April 28, 2009, the ASTM International, a non-profit organization under the 501(c)(3) of the Internal Revenue Code, will host a reception at the Knights Conference Center, Level 7 (top of the Newseum), in Washington, D. C., from 6:00 p.m. to 8:30 p.m. This event is consistent with OMB-A119, ASTM International works in partnership with Federal agencies in the development of voluntary consensus standards.

Approximately 200 people will be invited, and about 125 are expected to attend. Attendees will include NASA personnel, industry leaders, officials from other Federal agencies, members of Congress and their staffers, academia, and other aerospace associations. The estimated cost of the reception, which includes all food and beverages is \$120.00 per person. The reception will allow NASA employees an opportunity to interface between the elected leadership and staff of ASTM, and DC based members and stakeholders.

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. Accordingly, NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance to the reception for themselves.

However, NASA employees whose duties may substantially affect ASTM, such as by way of procurement duties, or who are in non-career positions in 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)(1) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone