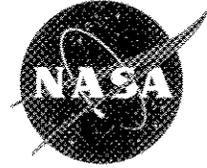


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



June 2, 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 STS-127
Post-Launch Reception hosted by Pratt & Whitney Rocketdyne on June 13, 2009

NASA invitees, accompanied by their spouse or a guest, may attend a post-launch reception sponsored by Pratt-Whitney Rocketdyne at the Hilton Cocoa Beach Oceanfront Hotel, Cocoa Beach, in Florida, on June 13, 2009, from 8:30 a.m.-11:30 a.m.

The reception will be widely attended by Federal officials from Government agencies, local government officials, representatives of industry and private individuals, and academia. Approximately 200 people have been invited and 100 are expected to attend. The estimated cost of the reception, which includes all food and beverages, is \$35.00 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 have determined that free attendance at the above mentioned reception is in the interest of the agency because it will further agency programs and operations. The event will provide NASA employees to discuss the STS-127 shuttle launch mission and other NASA programs with representation of the communities participating in the reception.

Accordingly, NASA employees that have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. However, NASA employees whose duties may substantially affect Pratt-Whitney Rocketdyne, 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.

Moreover, NASA employees who are in non-career positions in which the President's Executive Order of January 21, 2009, requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the reception for themselves and any accompanying guest.

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

Adam F. Greenstone