National Aeronautics and
Space Administration
Goddard Space Flight Center
Greenbelt, MD 20771

June 4, 2009

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Determination Regarding Attendance of NASA Employees at the American Institute of Aeronautics and Astronautics National Capital Section Honors and Awards Banquet

The American Institute of Aeronautics and Astronautics National Capital Section (AIAA NCS) is hosting an Honors and Awards Banquet the evening of June 18, 2009 at the Army Navy Country Club in Arlington, VA. The event is being co-sponsored by ATK, Harris Corporation, Honeywell, Jackson&Tull, Lockheed Martin Corp., Northrop Grumman, and Raytheon Corp. The purpose of the event is to recognize middle and high school students who are award recipients from the 2009 AIAA NCS science fair competitions, educators who exemplify outstanding instruction of math or science in elementary, middle and high schools in the Washington D.C. area, Young Engineers and Engineer recipients for their work in the advancement of science and technology, and AIAA NCS members for their service to AIAA NCS. The guest speaker for the event will be Mr. Frank Cepollina, Deputy Associate Director for the Hubble Space Telescope Development Project, NASA Goddard Space Flight Center.

Approximately 100 guests are expected to attend the banquet, including individuals from the aerospace industry, NASA, other Federal agencies, Congress, local government, and educational institutions. Tickets are $70 apiece for members and $75 for non-members, and the cost per person is approximately $32.00. Attendance at the reception will allow NASA employees an opportunity to discuss with other guests issues concerning NASA's space research and exploration plans, the recent Hubble Space Telescope Servicing Mission, and the importance of encouraging careers in science and engineering.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). I further find that there is an Agency interest in having NASA employees attend this event. Accordingly, NASA employees whose duties do not substantially affect AIAA or any of the other co-sponsors may accept an invitation for free attendance to the event for themselves and their spouses or guests.

NASA employees whose duties substantially affect AIAA or any of the other co-sponsors, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

Robert M. Stephens