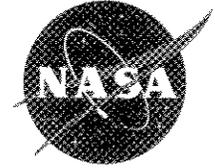


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



June 10, 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 the Space Transportation Association (STA) Luncheon June 10, 2009

On June 10, 2009, the Space Transportation Association (STA), a non-profit organization under 501(c)(6) of the Internal Revenue Code, will host a luncheon with Congresswoman Gabrielle Giffords, at the Tortilla Coast. The sponsor members of the STA include Aerojet, ATK, Ball, Boeing, ITT, Lockheed Martin, QineiQ, Pratt & Whitney Rocketdyne, ULA, USA, and Wyle. STA's focus is on ensuring reliable cost effective space launch services for NASA, DoD, and the commercial market.

The breakfast will be attended by representatives of the aerospace industry, trade associations, the media, Congressional staffers, Congress, academia, and other Federal agencies. Approximately 200 people have been invited and 25 are expected to attend. The estimated cost of the breakfast, which includes all food and beverages, is \$25.00 per person. I find that the STA 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 because it will further Agency programs or operations. Attendance at the breakfast will allow NASA representatives to hear Congresswoman Gabrielle Giffords speak on areas of interest to NASA, and to discuss the Vision for Space Exploration with the other attendees. Accordingly, NASA employees whose duties do not substantially affect STA or a majority of all of its members may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

NASA employees whose duties may substantially affect STA or its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) 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