

National Aeronautics and  
Space Administration  
**John F. Kennedy Space Center**  
Kennedy Space Center, FL 32899



June 9, 2009

Reply to Attn of: CC-A

TO: Distribution

FROM: CC/Chief Counsel

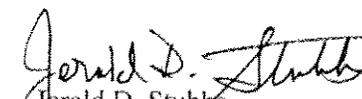
SUBJECT: Attendance at the STS-127 Pre-Launch L-2 Reception Sponsored by Mechanical Engineering, Inc. (MEI)

On June 11, 2009, MEI will host a pre-launch reception in anticipation of the STS-127 launch. The event will be held at the Hilton Cocoa Beach Oceanfront, from 6:00 pm to 8:00 pm. Approximately 125 guests are expected to attend. These guests include a wide range of representatives that include industry leaders, NASA senior management, state and local elected officials, KSC contractor leaders, and NASA employees. The approximate value of the reception is \$21 per person.

I find 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. This event will allow NASA employees to discuss the NASA Vision for Space Exploration, the Space Shuttle program, JAXA, and the STS-127 mission with the other attendees. In addition, this event is a forum for the attendees to disseminate information on NASA's ongoing activities and to discuss matters of interest to NASA with a diverse group. Accordingly, NASA employees whose duties do not substantially affect MEI may accept an invitation for complimentary attendance at the event.

NASA employees whose duties may substantially affect MEI, 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 the Chief Counsel's Office.

In addition, MEI will provide a commemorative trinket valued at less than \$10.00 each to the attendees. Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 per occasion. Accordingly, in addition to accepting free attendance at the event, NASA employees may accept the commemorative trinket. NASA invitees are reminded not to exceed the \$50 cap on gifts from one source in a calendar year.

  
Gerald D. Stubbs  
Agency Designee