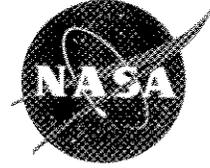


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



July 9, 2009

Reply to Attention: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at an STS-125
Crew Hill Reception hosted by United Space Alliance (USA) on July 22, 2009

On July 22, 2009, the United Space Alliance (USA), with co-sponsors Ball Aerospace, Aerojet, Lockheed Martin, ATK, Honeywell, SAIC, Boeing, Jacobs, Orbital Sciences Corporation, Teledyne Technologies, Pratt & Whitney Rocketdyne and UTC, will host a reception at the Rayburn House Office Building, Room 2168 in Washington, DC, from 5:00p.m-7:00p.m.

This event will be a widely-attended gathering of approximately 600 representatives of NASA, the aerospace industry, Congress and their staffers, trade associations, academia, and media. The cost of the reception will be approximately \$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 with the opportunity to discuss the STS-125 Hubble 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 the event sponsors, 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 the ethics pledge may only attend if they reimburse the sponsors the cost of the reception for themselves and any accompanying guest.

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 and no more than \$50 from one source in a calendar year. NASA invitees should not accept any gift items distributed at the reception which exceed these caps.

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

Adam F. Greenstone