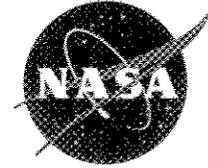


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



December 3, 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) Breakfast on December 3, 2009

On December 3, 2009, the Space Transportation Association (STA), will host a breakfast with Robert M. Lightfoot, Jr., Director, NASA Marshall Space Flight Center (MSFC) with an introduction by Congressman Robert Aderholt, at the Rayburn House Office Building, Room B-369, in Washington, D. C. , from 7:30 a. m.-9:00 a. m. The co-sponsors of the STA include Aerojet, ATK, Ball, Boeing, ITT, Lockheed Martin, QineiQ, Paragon, Pratt & Whitney Rocketdyne, ULA, United Space Alliance, and Wyle.

The breakfast will be attended by representatives of the aerospace industry, trade associations, the media, Congressional staffers, Congress, academia, and other Federal agencies. Approximately 300 people have been invited and 30 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 Robert M. Lightfoot speak on areas of interest to NASA, and to discuss NASA's programs and plans. 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.

Moreover, NASA employees whose duties do not substantially affect the event sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490 may accept an invitation for free attendance to the event. 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. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.


Adam F. Greenstone