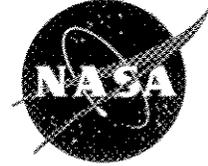


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



January 6, 2010

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 Harris GOES-R Team Reception on January 18, 2010

On January 18, 2010, Harris Corporation and co-sponsors ITT, AER, CARR, Boeing, Wyle, ARES, and Honeywell, will host a reception at the Georgia Aquarium, in Atlanta, GA, from 7:00p.m.-10:00p.m. This event is to celebrate the GOES-R satellite program.

The reception will be attended by representatives of the aerospace industry, trade associations, the media, Congressional staffers, White House personnel, Congress, academia, and other Federal agencies. Approximately 5,000 people have been invited including NASA personnel. The estimated cost of the reception, which includes all food and beverages, is \$15.00 per person. I find that the Harris Corporation 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 reception will allow NASA representatives to discuss NASA's programs and plans, and to discuss the Vision for Space Exploration with the other attendees. Accordingly, NASA employees whose duties do not substantially affect the event sponsors 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.

However, NASA employees whose duties may substantially affect the event sponsors 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. Moreover, NASA employees who are in non-career positions in which Executive Order 13490, requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the reception for themselves and accompanying guests.