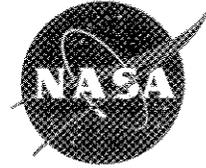


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



February 25, 2010

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Women In Aerospace Breakfast on March 4, 2010

On March 4, 2010, Women In Aerospace (WIA), and co-sponsors the Boeing Company, Aerojet, The Avascent Group, and Northrop Grumman, will host a breakfast at the Hyatt Regency Hotel-Capitol Hill, in Washington, D. C., from 7:30a.m.-9:30a.m. The breakfast will include guest speaker Lori Garver, who currently serves as the NASA Deputy Administrator.

The breakfast will be attended by representatives of the aerospace industry, trade associations, the media, Congress, academia, Federal agencies, and NASA personnel. Approximately 3,000 people have been invited and 144 are expected to attend. The estimated cost of the breakfast, which includes all food and beverages is \$60.00 per person. I find that the breakfast meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g)(2). This event will allow NASA employees to discuss NASA's space programs with other people who are interested in aerospace issues and space development, and to hear Ms. Garver discuss space-related issues and NASA programs with other attendees. I have determined that free attendance at the above mentioned breakfast is in the interest of the agency because it will further agency programs and operations.

However, NASA employees in non-career positions for which the Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the breakfast for themselves and accompanying guests. Moreover, 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.

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

Adam F. Greenstone