

National Aeronautics and
Space Administration
Goddard Space Flight Center
Greenbelt, MD 20771



February 25, 2010

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at
GOES-P Viewing and Launch Receptions

Boeing is sponsoring a viewing and a post-launch reception for GOES-P launch currently scheduled for March 2, 2010. The events will be held at the Kennedy Space Center and the Doubletree Hotel in Cocoa Beach, FL, respectively. Approximately 300 individuals are expected to attend, including representatives from industry, academia, and Federal agencies. The cost per person of the viewing reception is \$30 and for the post-launch reception is \$35.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). I further find that there is an Agency interest in having NASA employees attend this event because attendance at the receptions will allow NASA employees an opportunity to discuss the GOES program with the other guests. Accordingly, NASA employees whose duties do not substantially affect the event sponsor may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

NASA employees whose duties substantially affect the event sponsors, for instance by way of procurement duties, should seek an individual determination 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 an ethics pledge may only attend if they reimburse the sponsor the cost of the refreshments they consume at the reception.


Robert M. Stephens