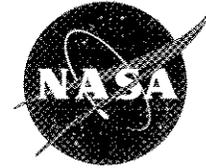


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



March 11, 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 American Institute of Aeronautics and Astronautics (AIAA) Aerospace Spotlight Awards Gala on May 12, 2010

On May 12, 2010, the American Institute of Aeronautics and Astronautics (AIAA), a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host its Aerospace Spotlight Awards Gala at the Ronald Reagan Building and International Trade Center in Washington, D.C., from 6:30p.m.-10:00p.m.

The dinner will be widely attended by officials from other Federal agencies, members of Congress and their staffers, academia, industry and aerospace associations. Approximately 650 individuals have been invited to the dinner. The estimated cost of the dinner, which includes all food and beverages, is \$100.00 per person. The dinner will allow NASA employees the opportunity to discuss space related issues and concerns with other attendees and to recognize aerospace achievement.

I find that this 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 so that NASA invitees-including employees in non-career positions for which the Executive Order 13490 requires signing an ethics pledge-may attend the event without charge.

However, NASA employees whose duties may substantially affect AIAA, or a majority of its members 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", written in a cursive style.

Adam F. Greenstone