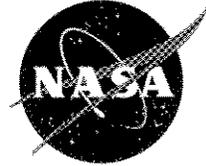


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001

April 2, 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 Women In Aerospace and Reception on May 18, 2010

On May 18, 2010, Women In Aerospace (WIA), a non-profit organization under 501(c)(4) of the Internal Revenue Code, and co-sponsors ITT, The Boeing Company, Ball Aerospace, Infinite Links, DFL Space LLC, Special Aerospace Digital Globe, ATK, Lockheed Martin, Orbital Sciences Corporation and SAIC, will host a reception at the Hyatt Regency Hotel, in Washington, D. C., from 9:00 a.m.-6:00 p.m. This is WIA's first all day conference. The Sessions will focus on issues of importance to women in aerospace and on topics of general aerospace interest.

The reception will be attended by representatives of the aerospace industry, trade associations, the media, Congress, academia, Federal agencies, and NASA personnel. Approximately 1,252 people have been invited and are expected to attend. The estimated cost of the reception, which includes all food and beverages is \$75.00 per person. I find that the reception 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 the opportunity to discuss NASA's space program with other people who are interested in aerospace issues. I have determined that free attendance at the above-mentioned reception 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 event sponsors the cost of the reception 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.


for Adam F. Greenstone