National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

April 28, 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 Maryland Space Business Roundtable Luncheon (MSBR) on May 25, 2010

On May 25, 2010, the Maryland Space Business Roundtable (MSBR), a non-profit organization under 501(c)(3) of the Internal Revenue Code, is hosting a luncheon at Martin's Crosswinds, in Greenbelt, MD, at 11:30a.m. The guest speaker will be Mary Kicza, Assistant Administrator for Satellite and Information Services, NOAA.

Approximately 350 people have been invited and 200 are expected to attend. The estimated cost of the luncheon which includes all food and beverages, is $22.00 per person. The luncheon will be attended by NASA personnel, representatives of the aerospace industry, state and local officials, the media, members of Congress and congressional staffers, academia, and employees of other Federal agencies. I find that this luncheon 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 event will allow attendees to exchange information regarding various NASA programs. Moreover, NASA employees whose duties do not substantially affect MSBR, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490 may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect the MSBR, 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.

Kathleen T. Apsan for

Adam F. Greenstone