

National Aeronautics and Space Administration
Kennedy Space Center
Kennedy Space Center, FL 32899



August 27, 2010

Reply to Attn of:

CC-A

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance Discovery Science Center Reception
Sponsored by United Launch Alliance, Boeing Company, and Discover Science
Center – September 1, 2010

On September 1, 2010, United Launch Alliance, The Boeing Company, Pratt Whitney Rocketdyne, and the Discovery Science Center will co-host a reception for the Space Exploration exhibit (which has a life-size model of JPL's "Curiosity" Mars Rover) and the Boeing Rocket Lab in the science center. The event will be held from 6-8 p.m. at the Discovery Science Center in Santa Ana, California. Approximately 300 guests have been invited to attend the reception. Attendees include a wide range of representatives such as aerospace industry leaders and personnel, NASA senior management and personnel, Federal, state and local elected officials, academia, and media representatives. The market value of the reception is \$64 per person.

I find 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. This event will allow NASA employees to discuss the NASA Vision for Space Exploration with the other attendees and to inspire the next generation of rocket scientists and engineers through the support of Science, Technology, Engineering, and Math education programs. In addition, this event is a forum for the attendees to disseminate information on NASA's ongoing activities and to discuss matters of interest to NASA with a diverse group.

Accordingly, NASA employees whose duties do not substantially affect any of the sponsors may accept attendance at the reception. NASA employees whose duties may substantially affect any of the 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 the Chief Counsel's Office. NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the cost of their attendance.

In addition, the sponsors will provide a gift bag with a mini-mouse, a luggage tag, a ball point pen, and a bag of "astronaut ice cream" valued under \$15 to each of the attendees. Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 per occasion. Accordingly, in addition to accepting free attendance at the event, NASA employees may accept the gift bag. NASA invitees are reminded not to exceed the \$50 cap on gifts from one source in a calendar year.


Gerald D. Stubbs
Agency Designee

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