National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

Reply to Attn of:

August 27, 2010

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at an STS-133 Pre-Launch Reception hosted by United Space Alliance (USA) on October 31, 2010

NASA invitees, accompanied by their spouse or a guest, may attend a pre-launch reception sponsored by United Space Alliance (USA), and co-sponsors Lockheed Martin and the Boeing Company at the Hilton, Cocoa Beach, in Florida, on October 31, 2010, from 7:30 p.m.-10:30 p. m. This event will provide NASA employees the opportunity to discuss the mission, the shuttle program, and other NASA space programs with community and aerospace industry representatives who are interested in NASA's mission and programs.

This event will be a widely-attended gathering of approximately 600 representatives from government, the aerospace industry and the local community. Food and refreshments will be served at a cost of approximately $34.00 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). 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. Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for an accompanying spouse or guest.

However, NASA employees who are in non-career positions in which Executive Order 13490, requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the reception for themselves and any accompanying guest. 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.

Adam F. Greenstone