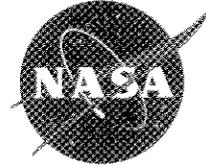


National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

September 8, 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 3rd Annual Washington, D.C. Space & Cyber Conference on September 9-10, 2010

On September 9-10, 2010, sponsors, Center for Strategic and International Studies (CSIS) and American Branch of International Law Association (ABILA), both non-profit organizations under section 501(c)(3) of the Internal Revenue Code, will host a lunch and a reception at the Newseum, in Washington, D.C. from 8:00 a.m.-5:00 p.m.

The lunch and reception will be attended by representatives of the aerospace industry, trade associations, the media, Congress, academia, Federal agencies, and NASA personnel. Approximately 150 people have been invited and are expected to attend. The estimated cost of the lunch and reception, which includes all food and beverages is \$80-\$100 per person. I find that the lunch and the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). This event will provide NASA employees with the opportunity to discuss policy issues related to national space and cyber security issues 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 whose duties may substantially affect the event sponsors or a majority of its members such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

NASA employees who are in non-career positions for which Executive Order 13490 requires signing an ethics pledge are covered by this determination.

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. NASA invitees should not accept any gift items distributed at the reception which exceed the \$20 cap. NASA invitees who are required to sign the ethics pledge may only receive such gifts if they reimburse the sponsors the fair market value.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone