



September 10, 2010

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding 2010
Oceaneering/Marine Technology Society Symposium

On September 16, 2010, the Washington Section of the Marine Technology Society (MTS) will host its annual Oceaneering Symposium and September meeting. The event is co-sponsored and co-funded by the Washington Section of MTS and Oceaneering International, Inc. Advanced Technologies. The event will be held at Oceaneering International, Inc. in Hanover, Maryland.

Approximately 400 - 450 people are expected to attend the event, including members of the Washington MTS, as well as representatives of industry, academia, the Department of Defense, and other branches of the federal government. The estimated cost of food and beverages at the event is \$40 per person. A commemorative MTS coin worth approximately \$3 will be given at no cost to the first 400 attendees. There is no fee to attend this event. The conference will include a presentation by RADM (Sel) Joseph P. Mulloy, U.S. Dept. of Navy. The event will include displays, demonstrations and discussions of marine and ocean leading edge technologies from approximately 20 exhibitors, including small and disadvantaged businesses.

Attendance at the symposium will allow NASA employees an opportunity to discuss hardware, software, service capability, and data gathering that are applicable and complimentary to the Earth Observing Mission of NASA GSFC. I therefore conclude that NASA's interest in its employees attending these events outweighs any concern that attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Based on the above, I find that the events meet the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Accordingly, NASA employees whose duties do not substantially affect the sponsors identified above may accept free attendance to and/or refreshments at the event for themselves and their guests.

NASA employees whose duties substantially affect Ocean International Inc. Advanced Technologies, the Maritime Technology Society, or any of the other sponsors noted

above, for instance by way of procurement duties, should seek an individual determination regarding participation in these events from their local ethics counselor.



Robert M. Stephens