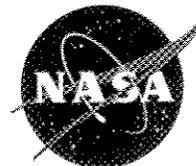


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



October 8, 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 Heads of Agencies Dinner Sponsored by the International Academy of Astronautics (IAA) on November 16, 2010

On November 16, 2010, the International Academy of Astronautics (IAA) will host a dinner at the Phillips Collection in Washington, D.C. Lockheed Martin Corporation, International Academy of Astronautics, Arianespace & Space News will support the event. However, attendees accepting invitations from the IAA will be assigned seating by the IAA on the recommendations of its outside planning consultant without considering the views of these supporting organizations.

Invitees to the dinner will include leaders of national space agencies, along with their spouse and/or an interpreter and staff member. Representatives from the supporting industry and media organizations will also attend. Total attendance is expected be approximately 70 people. The estimated cost of the dinner, including all food and beverages, is \$175 per person. I find that the dinner meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g)(2).

This event will provide NASA representatives the opportunity to discuss NASA's programs and plans with leaders of space agencies from other nations, as well as with representatives from industry and the media sectors who are present. Accordingly, 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. The NASA Administrator may accordingly accept an invitation to attend from IAA for himself and his spouse, and other NASA employees receiving an invitation – including those in non-career positions for which Executive Order 13490 requires signing an ethics pledge – may also attend.

This determination does not apply to invitations to this event from entities other than IAA, and any NASA employee receiving an invitation from other than IAA should seek an individual determination form their local NASA ethics counselor. Moreover, NASA employees whose duties may substantially affect IAA, 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 the event from their local NASA ethics counselor.

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 that exceed the \$20 cap.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', with a long horizontal flourish extending to the right.

Adam F. Greenstone