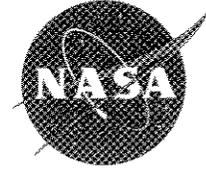


National Aeronautics and Space Administration
Langley Research Center
100 NASA Road
Hampton, VA 23681-2199



October 20, 2010

Reply to Attn of: 141/Office of Chief Counsel

TO: Distribution

FROM: 141/Langley Research Center, Deputy Chief Counsel

SUBJECT: Blanket approval to attend a Bay Area Houston and Orbital Sciences Corporation co-sponsored Space Shuttle Discovery STS-133 mission pre-launch reception on Sunday, October 31, 2010, from 6-8 p.m. at the Lower Pool Deck at the Doubletree Hotel, Cocoa Beach, Florida.

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

NASA invitees, accompanied by their spouse or a guest, may attend a Space Shuttle Discovery STS-133 mission pre-launch reception co-sponsored by Bay Area Houston and Orbital Sciences. The reception will take place on Sunday, October 31, 2010, from 6-8 p.m. at the Lower Pool Deck at the Doubletree Hotel, Cocoa Beach, Florida.

This event is being held in conjunction with the launch of Space Shuttle Discovery STS-133, at the Kennedy Space Center on November 1, 2010.

This event will be a widely-attended gathering of approximately 500 representatives of government, the aerospace industry, academia and the community. Heavy hors d'oeuvres will be served at a cost of approximately \$10 per person.

I have determined that free attendance at the above mentioned reception is in the interests of the agency because it will further agency programs and operations. The attendance of NASA employees at the event will provide employees the opportunity to discuss the mission, the shuttle program, and other NASA space programs with interested members of the aerospace industry, academia, and the community. Given the purpose of the event, the broad attendance anticipated, and the modest market value of this social event, I have determined that the value to the agency in having employees attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA LaRC employees that have been invited to attend may accept free attendance at the event. They may also accept invitations for an accompanying spouse or guest. The sponsors are also offering a memento of the occasion valued at \$5, which NASA

employees and invited spouses and guests may accept under the gift prohibition exception that permits employees to accept gifts valued at \$20 or less per occasion.

NASA employees whose duties may substantially affect Bay Area Houston or Orbital Sciences Corporation are not covered in this determination and should seek from their local ethics counselor a determination pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in these events.

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 and mementos for themselves and any accompanying guest.

Questions about this determination may be addressed to Pete Polen at 757-864-3221.



Shawn T. Gallagher