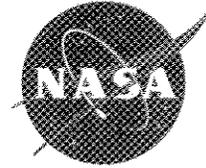


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



November 1, 2010

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the ASI and Thales Alenia Space Dinner on November 1, 2010

On or about November 1, 2010, the Italian Space Agency (ASI), and co-sponsor Thales Alenia Space, will host a dinner at the Marriott Hotel, Cocoa Beach, Florida at 8:00 p.m. The event will be a celebration of the STS-133 Space Shuttle flight and the Permanent Multi-Purpose Module.

Approximately 100 individuals have been invited. Attendees will include representatives of ASI and ThalesAlenia Space, other industry, the Italian government, and NASA personnel. The estimated cost of the reception, which includes all food and beverages, is \$60 per person.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event because they will have the opportunity to share views on the civil space program with their counterparts in civil, commercial, national security and international space. Moreover, NASA employees whose duties do not substantially affect the event sponsors may accept an invitation for free attendance to the event for themselves and their invited spouses or guests.

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 CFR § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

In addition, 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 accompanying guests.

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

Adam F. Greenstone

