

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 Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Arianespace Reception on November 16, 2010

On November 16, 2010, Arianespace will host a reception at the Society of the Cincinnati Anderson House in Washington, D.C. from 7:30a.m.-9:00a.m. The reception will coincide with the dinner for heads of national space agencies hosted by the International Academy of Astronautics (IAA) that evening.

The reception will be attended by heads of national space agencies, their spouses, and members of their staff accompanying them to the IAA Heads of Agencies dinner, in addition to representatives of the U.S. legislative branch, the Department of Defense, the National Oceanic and Atmospheric Administration (NOAA), and industry, and members of the IAA. Over 400 people have been invited and 250 are expected to attend. The estimated cost of the refreshments, which includes all food and beverages, is \$25.00 per person. I find that the Arianespace reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the reception will allow NASA representatives to discuss NASA's programs and plans with key international partners, and domestic and private sector entities with an interest in NASA activities. Accordingly, NASA employees whose duties do not substantially affect Arianespace may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

However, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend if they reimburse the sponsor the cost of the reception for themselves and accompanying guests. An "honor basket" will be provided by Arianespace to provide reimbursement on site. Moreover, NASA employees whose duties do not substantially affect Arianespace, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. §2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.


Adam F. Greenstone