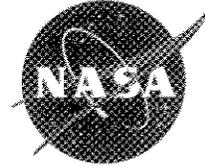


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



November 18, 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 Space Transportation Association Breakfast (STA) on November 18, 2010

On November 18, 2010, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue code, will host a breakfast and award presentation in Rayburn House Office Building, Room 2359, in Washington, D.C., at 7:30 AM. Co-sponsors of the event include Aerojet, ATK, Ball Aerospace, Boeing, ITT, Lockheed Martin, Paragon, Pratt & Whitney Rocketdyne, United Launch Alliance, United Space Alliance, and Wyle.

The breakfast is to present an award to Representative Alan B. Mollohan. Approximately 300 people have been invited to attend, including NASA personnel, the White House, Members of Congress and staffers, the media, representatives of the aerospace industry, and employees of other Federal agencies. The estimated cost of the breakfast, including all food and beverages, is \$25.00 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

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 event will allow NASA attendees to exchange information regarding various NASA programs. Accordingly, NASA employees who have been invited to attend may accept free attendance at the event.

However, NASA employees whose duties may substantially affect the sponsors, 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 this event from their local ethics counselor. Moreover, 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 breakfast.

Kathleen T. Aprian

for Adam F. Greenstone