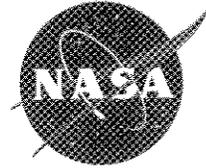


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



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 Policy Institute (SPI) Dinner on December 3, 2010

On December 3, 2010, the Space Policy Institute of George Washington University's (GWU) Elliott School of International Affairs, a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Code, will hold a space policy dinner at the Primi Piatti Restaurant, in Washington, D.C. from 6:30 p.m. – 9:30 p.m.

The dinner will include a guest speaker Mr. Hirofumi Katase, Deputy Secretary-General of Strategic Headquarters for Space Policy, Government of Japan. Ninety-five people have been invited to this event and approximately 48 people are expected to attend. Attendees will include personnel from NASA, other Federal Agencies, Congressional staff, White House staff, academia, industry, the media, and non-profit organizations. The estimated cost of the event, including all food and beverages, is \$65-\$72 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 on civilian and military space programs. Accordingly, NASA employees whose duties do not substantially affect the sponsor, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsor, 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.

Kathleen T. Spear

for Adam F. Greenstone