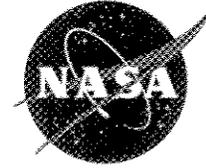


National Aeronautics and Space Administration  
**Headquarters**  
Washington, DC 20546-0001



December 8, 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 Luncheon (STA) on December 8, 2010

On December 8, 2010, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue code, will host a luncheon at the U.S. Senate Russell Office Building, Room 325, in Washington, D.C., from 12:00 PM – 1:30 PM. Co-sponsors of the event include Aerojet, ATK, Ball Aerospace, Boeing, ITT, Lockheed Martin, Paragon, Pratt & Whitney Rocketdyne, ULA, United Space Alliance, and Wyle.

The luncheon is to provide an update and way ahead for the NASA Wallops Flight Facility to the aerospace community and to share views with colleagues. Approximately 300 people have been invited to attend, including NASA personnel, the White House, Members of Congress and congressional staff, the media, representatives of the aerospace industry, employees of other Federal agencies, as well as the general public. The estimated cost of the luncheon, 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.

NASA employees whose duties do not substantially affect the STA, 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 STA, 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.

Adam F. Greenstone