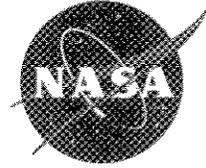


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



January 21, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the Government University-Industry  
Research Roundtable (GUIRR) Dinner and Conference on February 8-9, 2011

On February 8-9, 2011, the Government University-Industry Research Roundtable (GUIRR), a non-profit organization under Section 501(c)(3) of the Internal Revenue Code, will host a meeting and dinner at the Ritz Carlton, Georgetown, in Washington, D.C., from 6:00 p.m.-8:00 p.m. on February 8, and from 8:00 a.m. – 3:00 p.m. on February 9. This event is to engage in cross-sector dialogue among senior leaders from government (federal research agencies), academia and industry around the topic of Cybersecurity in the context of protecting intellectual property rights. Senator Jay Rockefeller, the Chairman of the Senate Committee on Commerce, Science and Transportation, will be the guest speaker at the dinner.

This event will be a widely attended gathering of approximately 15-20 representatives of government, aerospace industry, business, and academic leaders. The estimated cost of the dinner, which includes all food and beverages, is \$75.00 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 NASA personnel attending the event. Moreover, NASA employees whose duties do not substantially affect the event sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation 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.

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

Adam F. Greenstone