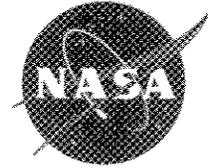


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



January 31, 2011

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 Foundation and Japan Aerospace Exploration Agency reception on January 31, 2011

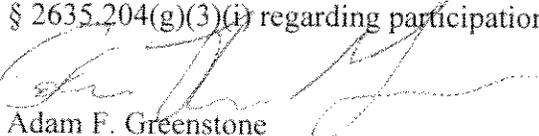
On January 31, 2011, the Ambassador of Japan, Mr. Ichiro Fujisaki, the Japan Aerospace Exploration Agency, and the Space Foundation will co-host a reception at the Residence of the Ambassador of Japan, 4000 Nebraska Avenue, NW, in Washington, D.C., from 6:00 PM – 7:30 PM. The Space Foundation is a nonprofit organization under 501(c)(3) of the Internal Revenue code.

The reception is in appreciation of U.S.-Japanese space cooperation. Approximately 400 people have been invited to attend, including representatives from NASA, JAXA, the White House, Members of Congress and congressional staff, the media, academia, the aerospace industry, and other Federal agencies. The estimated cost of the reception, including all food and beverages, is \$32.00 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 with the other attendees.

NASA employees whose duties do not substantially affect the 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 themselves and an invited guest for free attendance to 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.


Adam F. Greenstone