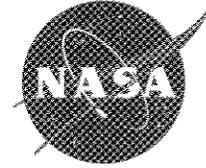


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



February 10, 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 Transportation Association Reception (STA) on February 10, 2011

On February 10, 2011, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue code, will host a reception in Rayburn House Office Building, Room 2325, in Washington, D.C., from 5:00 to 6:30 PM. Co-sponsors of the event include Aerojet, ATK, Ball Aerospace, Honeywell, ITT, Lockheed Martin, Paragon, Pratt & Whitney Rocketdyne, United Launch Alliance, United Space Alliance, and Wyle.

The reception will honor Representative Ralph Hall, the Chairman of the House of Representatives' Science, Space, and Technology Committee. Approximately 300 people have been invited to attend, including representatives from NASA, the White House, Members of Congress and staffers, the media, the aerospace industry, and other Federal agencies. The estimated cost of the reception, 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 with the other attendees. Accordingly, NASA employees – including NASA employees in non-career positions in which Executive Order 13490 requires signing an ethics pledge – 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.

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

Adam F. Greenstone