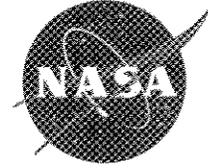


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



February 15, 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 ESA and Arianespace Launch Viewing Event on February 15, 2011

On February 15, 2011, the European Space Agency and Arianespace will host an event at the W Hotel in Washington, D.C. from 4 PM – 6 PM. The event is an occasion to view the 200th Ariane flight carrying the Johannes Kepler Automated Transfer Vehicle 2 (ATV) on a servicing mission to the International Space Station.

The event will be attended by representatives of the Congress and its staff, state and local governments, the aerospace industry, NASA, and other Federal agencies. Over 300 people are expected to attend. The estimated cost of the refreshments, which includes 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).

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 reception will allow NASA representatives to discuss NASA's programs and plans with the other attendees. Accordingly, NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance to the reception for themselves and their invited spouses or guests.

However, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend if they reimburse the sponsors the cost of the event for themselves and accompanying guests. An "honor basket" will be provided by Arianespace to provide reimbursement on site. Moreover, NASA employees whose duties do not substantially affect Arianespace, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. §2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

*Kathleen T. Spear*  
for Adam F. Greenstone