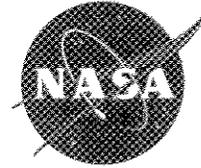


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



February 16, 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 Policy Institute Dinner on February 25, 2011

On Friday, February 25, 2011, the Space Policy Institute of George Washington University's (GWU) Elliott School of International Affairs, a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Code, will hold a space policy dinner at the Primi Piatti Restaurant, in Washington, D.C. from 6:30 – 9:30 p.m. The purpose of this dinner is to provide a forum for discussion of current topics in space policy with a wide cross-section of the local Washington community.

Dumitru-Dorin Prunariu, the current chairman of the United Nations Committee on the Peaceful Uses of Outer Space, will be the guest speaker at the dinner. His remarks will focus on the work of the committee and, in particular, efforts to improve the long-term sustainability of the space environment. 150 people were invited and around 50 will attend the event. Attendees will include personnel from NASA, other Federal Agencies, Congressional staff, White House staff, academia, industry, the media, embassies, non-profit organizations, and think tank researchers. The estimated cost of the event, including all food and beverages, is around \$70 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 on NASA's aerospace programs. Accordingly, NASA employees whose duties do not substantially affect the sponsor, 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 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