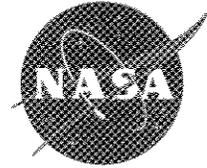


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



March 8, 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 COSPAR and CNES Reception, and Dinner on March 23, 2011

On March 23, 2011, the Committee on Space Research (COSPAR) of the International Council for Science, a nonprofit organization, and the Centre National d'Etudes Spatiales (CNES) are hosting a reception at CNES in Paris, France at 6:00 PM. The reception will provide a forum for the exchange of knowledge and also for the discussion of space research problems and solutions.

I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). Approximately 120 people will attend the reception including representatives from academia, international science experts, national and international science organizations, other foreign nationals, and NASA. The estimated per person costs of food and refreshments during the reception is \$21.

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. NASA attendees will be able to exchange information about the U.S. space program with the international science community.

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.

Kathleen T. Spear
for Adam F. Greenstone