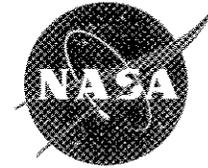


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



March 16, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at International Astronautical Federation Anniversary Celebration, March 22, 2011

Representatives from NASA have been invited to attend a 60th anniversary celebration of the International Astronautical Federation (IAF) at the UNESCO Headquarters in Paris, France at 6:00 PM on March 22, 2011. It is also intended to honor the 50th anniversary of human space flight. The IAF is a non-governmental, non-profit, membership organization, based in Paris, France. The IAF encourages the advancement of knowledge about space and the development and application of space assets for the benefit of humanity. It disseminates information and provides a significant worldwide network of experts in the development and utilization of space. The event is supported by Lockheed Martin and MacDonald, Dettwiler and Associated Ltd. (MDA).

The celebration is being held in conjunction with the IAF's 2011 Spring Meeting. The event will include a lunch earlier in the day, followed by celebration activities and a cocktail reception. Approximately 1,800 people are expected to attend at a cost of about 81 Euros (\$113) per person. Attendees will include representatives from the space industry, non-profit organizations, academia, NASA, other Federal agencies, and foreign nationals as well as astronauts, cosmonauts and taikonauts.

I find that these events meet the requirements of a widely attended gathering as defined in 5 C.F.R. § 2635.204(g). Because of NASA's interest in international collaboration and in the advancement and application of spaceflight and related technologies, I find that there is an Agency interest in having NASA personnel attend. NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance at these events 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. Moreover, NASA employees whose duties substantially affect the hosts, 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.

Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year). NASA invitees should not accept any gift items distributed at the reception which exceed the \$20 cap.

*Kathleen T. Spear*

*for* Adam F. Greenstone