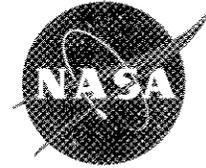


National Aeronautics and Space Administration

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 by NASA Employees at the Federal Republic of Germany Reception on March 23, 2011

On March 23, 2011, the Embassy of the Federal Republic of Germany, the German Aerospace Centre (DLR), Astrium GmbH, and Infoterra GmbH are hosting a reception at the Library of Congress in Washington, DC from 6:00 PM – 9 PM. The event will include a presentation of TanDEM-X (TerraSAR-X add-on for Digital Elevation Measurement), the WorldDEM Project, and Future German Radar Missions. TanDEM-X is a radar satellite that, with a twin satellite, circles the Earth and provide highly accurate mapping of the Earth's surface.

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 250-300 people will attend the reception including representatives from Congress and their staffers, state and local government officials, industry, foreign nationals, NASA and other Federal agencies, the media and the public. The estimated per person costs of food and refreshments during the reception is \$15.

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 a broad mix of attendees from the U.S. Legislative branch and the international science community. Accordingly, NASA employees whose duties do not substantially affect the sponsor may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect the event 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. Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may accept free attendance at the event only if they reimburse the sponsors for the cost of the reception.

Kathleen T. Spear

for Adam F. Greenstone