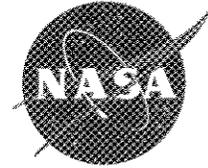


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



March 17, 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 Transportation Association (STA) Luncheon on March 18, 2011

On March 18, 2011, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a luncheon in Rayburn House Office Building, Room 2325, in Washington, D.C., from 11:30 AM to 1:00 PM. Co-sponsors of the event include Aerojet, ATK, Ball Aerospace, Honeywell, ITT, Lockheed Martin, Orbital, Paragon, Pratt & Whitney Rocketdyne, United Launch Alliance, United Space Alliance, and Wyle.

Charles Bolden, the NASA Administrator, will be speaking. Approximately 300 people have been invited to attend, including NASA personnel, the White House, Members of Congress and staffers, the media, representatives of the aerospace industry, and employees of other Federal agencies. The estimated cost of the luncheon, including all food and beverages, is \$25 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 regarding various NASA programs. 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.

With the exception of Mr. Bolden, who will be speaking, 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 may substantially affect the 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.

Kathleen T. Speer

for Adam F. Greenstone