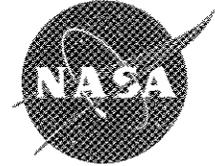


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



April 21, 2011

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the AIAA National Capital Section Luncheon (NCS) on April 21, 2011

On April 21, 2011, the American Institute of Aeronautics and Astronautics National Capital Section (AIAA NCS), a non-profit under section 501(c)(3) of the Internal Revenue Code, will host a luncheon at Channel Inn, in Washington, D.C. The scheduled speaker will be Dr. Edward Weiler, Associate Administrator for NASA's Science Mission Directorate.

Approximately 80 people are expected to attend. The estimated cost of the luncheon including all food and beverages is \$23.00 per person. The luncheon will be attended by representatives of the aerospace industry, trade associations, academia, representatives of other non-profit, for profit, and governmental entities, and students. I find that this luncheon meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

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 provide NASA attendees with the opportunity to discuss science and exploration related issues with other guests, and in conjunction with Dr. Weiler's remarks. Accordingly, NASA employees whose duties do not substantially affect the event 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 free attendance to the event.

However, NASA employees whose duties may substantially affect the AIAA-NCS, 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.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone