National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

June 24, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at Alliant Techsystems, Inc. (ATK) Reception at the Chincoteague Community Center, near NASA Wallops Flight Facility on June 28, 2011

Alliant Techsystems (ATK) and Goodrich Corporation will host a pre-launch reception of the Operationally Responsive Satellite 1 (ORS-1), at the Chincoteague Community Center at 6155 Community Drive, near the NASA Wallops Flight Facility, from 5:00 pm to 7:00 pm. The purpose of the event is to allow U.S. Government officials to discuss the Operationally Responsive Space program and other U.S. satellite needs.

I find that this reception meet the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). Approximately about 300 people are expected to attend including, in addition to executive branch employees, representatives of the U.S. Congress, U.S. and International aerospace and defense companies, academia, non-profit organizations, and the media. The cost per person of light appetizers and beverages that will be provided is approximately $30. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). This event will allow invited NASA employees to discuss the ORS-1 launch and other NASA programs and initiatives with individuals from the various sectors represented.

Accordingly, NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance for themselves and their invited spouses or guests at either or both receptions to which they are invited. However, 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. Moreover, NASA employees serving in non-career positions for which the President's Executive Order of January 21, 2009, requires signing an ethics pledge must reimburse the event sponsors for any refreshments they consume.

The sponsors will also distribute a small bag of commemorative items worth less than $10 in value. Attending NASA employees may accept these items so long as they will not have received more than $50 in gifts from either of the sponsors during 2011, though

non-career NASA employees subject to the ethics pledge may only accept these items if they reimburse the sponsor for their value.

Adam F. Greenstone