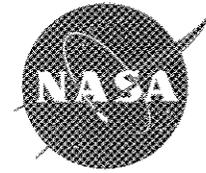


National Aeronautics and Space Administration  
Langley Research Center  
100 NASA Road  
Hampton, VA 23681-2199



July 1, 2011

Reply to Attn of: 30

TO: Distribution

FROM: 30/Langley Research Center, Chief Counsel

SUBJECT: Blanket approval to attend a CSC, ViGYAN, and Bay Area Houston Economic Partnership Space Shuttle Endeavor STS-135 mission pre-launch reception on Wednesday, July 6, 2011, from 6-8 p.m. at the Doubletree Hotel, Cocoa Beach, Florida.

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

NASA invitees, accompanied by their spouse or a guest, may attend a Space Shuttle Endeavour STS-135 mission pre-launch reception co-sponsored by CSC, ViGYAN, and Bay Area Houston Economic Partnership, on Wednesday, July 6, 2011, from 6-8 p.m. at the Doubletree Hotel, Cocoa Beach, Florida.

This event is to be held in conjunction with the launch of Space Shuttle Endeavour STS-135, at the Kennedy Space Center scheduled for Friday, July 8, 2011.

This event will be a widely-attended gathering of approximately 150 to 200 representatives of local, state, and federal government; the aerospace industry; academia; and the community. Heavy hors d'oeuvres will be served at a cost of approximately \$10 per person and a cash bar will be available.

I have determined that free attendance at the above-mentioned reception is in the interests of the agency because it will further agency programs and operations. The attendance of NASA employees at the event will provide employees the opportunity to discuss the mission, the shuttle program, and other NASA space programs with interested members of government, the aerospace industry, academia, and the community. Given the purpose of the event, the broad attendance anticipated, and the modest market value of this social event, I have determined that the value to the agency in having employees attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

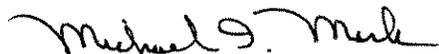
Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for an accompanying spouse or guest.

NASA employees whose duties may substantially affect the CSC, ViGYAN, and Bay Area Houston Economic Partnership are not covered in this determination and should seek a determination pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in these events from their local ethics counselor.

NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the reception for themselves and any accompanying guest.

In addition, each attendee will receive a small gift bag. The bag will include a variety of small items, with a total value of approximately \$5.00. NASA employees are reminded of the \$20.00 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20.00 per occasion per source. Accordingly, in addition to accepting free attendance at the event, each NASA employee may accept the gift bag for themselves and their accompanying spouse or guest. NASA invitees are also reminded not to exceed the \$50.00 cap on gifts from any one source in a calendar year.

Questions about this determination may be addressed to Pete Polen at 757-864-3221.



Michael I. Mark  
Acting Deputy DAEO