

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



July 1, 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 an STS-135 Post-Launch Reception Hosted by Pratt & Whitney Rocketdyne (PWR) on July 8, 2011

NASA invitees, accompanied by their spouse or a guest, have been invited to attend a post-launch reception sponsored by Pratt & Whitney Rocketdyne (PWR) at the Hilton Oceanfront Hotel, Cocoa Beach, Florida, on July 8, 2011, from 2 PM – 7 PM.

This event will be a widely-attended gathering of approximately 300 - 400 representatives of the government, the aerospace industry and the community. Food and refreshments will be served at a cost of approximately \$36 per person. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I have determined that attendance at the above mentioned reception is in the interest of the agency because it will further agency programs and operations. The event will provide NASA employees an opportunity to discuss the mission and other NASA programs with representatives of the communities participating in the reception.

Accordingly, NASA employees who have been invited to attend may accept the gift of attendance at the event. They may also accept invitations for accompanying spouses or guests. However, NASA employees whose duties may substantially affect PWR, 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 the 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. An "honor basket" will be provided by PWR to provide reimbursement on site.

Kathleen T. Spear
for Adam F. Greenstone