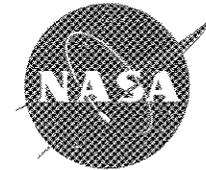


National Aeronautics and Space Administration

Langley Research Center

100 NASA Road
Hampton, VA 23681-2199



September 20, 2011

Reply to Attn of:

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TO: Distribution

FROM: 30/Langley Research Center, Chief Counsel

SUBJECT: Blanket Determination Regarding Attendance of NASA employees at the NASA Langley Shuttle Celebration Reception on September 23, 2011, from 6 to 10 pm at the Virginia Air and Space Center Sponsored by Lockheed Martin Corporation, the Virginia Air and Space Center, and NASA Langley Research Center

Lockheed Martin Corporation, the Virginia Air and Space Center, and NASA Langley Research Center are sponsoring a NASA Langley Shuttle Celebration Reception. The celebration reception will be held Friday, September 23, 2011, from 6 to 10 pm, at the Virginia Air & Space Center. The purpose of the reception is to celebrate the accomplishments of the Space Shuttle Program and the contributions NASA Langley civil service and contractor employees made to the program. During the celebration, both past and present Langley civil servant and contractor employees who contributed to the shuttle legacy will be honored.

The 1200 invited guests represent a broad sector of representatives from academia, local government and community leaders, NASA civil servants, and industry. The event will include hors d' oeuvres, refreshments, and musical entertainment. The estimated value of the reception is approximately \$25.00 per person.

Attendance at the reception will allow NASA invitees the opportunity to discuss the shuttle program and future space flight with representatives of academia, the private sector, local government and community leaders. Attendance of invited NASA employees at the event will further agency programs through discussion of the space shuttle program, the contributions of Langley employees and contractors to the program, and NASA's plans for the future of space flight. 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.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined by 5 C.F.R. § 2635.204(g). Accordingly, NASA employees whose duties do not affect Lockheed Martin Corporation or the Virginia Air and Space Center, including employees in non-career positions for which Executive Order 13490 requires

signing an ethics pledge, may accept the invitation for free attendance to the reception for themselves and their spouses or guests.

NASA employees whose duties may substantially affect Lockheed Martin Space Systems Company or the Virginia Air and Space Center are not covered in this determination and should seek a determination from an ethics counselor pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding their participation in this event.

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

A handwritten signature in black ink that reads "Michael N. Madrid". The signature is written in a cursive style with a prominent initial "M".

Michael N. Madrid
Deputy Designated Agency Ethics Official