

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



October 20, 2011

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the European Space Agency (ESA) and Arianespace Breakfast and Launch Viewing Event on October 20, 2011

On October 20, 2011, the European Space Agency (ESA) and Arianespace will host an event at the National Press Club Building, 4th Estate Restaurant in Washington, D.C. from 6 a.m. – 8 a.m. The purpose of the event is to witness live the launch of the first Soyuz launched from French Guiana.

The event will be attended by NASA personnel, NOAA, FCC, Members of Congress and its staff, the aerospace industry, academia, the media, NASA, and other Federal agencies. Over 400 people are expected to attend. The estimated cost of the refreshments, which includes all food and beverages, is \$20.00 per person. I find that the event 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 breakfast will allow NASA representatives to discuss NASA's programs and plans with the other attendees. Accordingly, NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance to the breakfast for themselves and their invited spouses or guests.

However, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend if they reimburse the sponsors the cost of the event for themselves and accompanying guests. An "honor basket" will be provided by Arianespace to provide reimbursement on site. Moreover, NASA employees whose duties do not substantially affect Arianespace, 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