

National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



November 30, 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 a Lunch hosted by the Space Transportation Association (STA) on December 5, 2011

On December 5, 2011, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue code, will host a lunch at 2325 Rayburn House Office Building in Washington, D.C., from 11:30 a.m. – 1 p.m. The event will feature the Honorable Charles F. Bolden, Jr., Administrator, National Aeronautics and Space Administration (NASA). Administrator Bolden will discuss NASA's year-end wrap up. STA member organizations that support STA activities include Aerojet, ATK, Ball Aerospace, Dynetics, Honeywell, ITT, Lockheed Martin, Orbital, Paragon, United Launch Alliance, United Space Alliance, and Wyle. STA is sending out all the invitations and arranging the seating for the attendees.

Approximately 300 people will attend the lunch, including representatives of Congress, the White House, industry representatives, the media and Federal Agencies such as NASA, DoD, and FAA. The estimated cost of the lunch, including all food and beverages, is \$25.00 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)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. This event will give NASA attendees the opportunity to discuss U.S. space policy and NASA's programs. Accordingly, NASA employees whose duties do not substantially affect the sponsors, including NASA employees in non-career positions subject to the Ethics Pledge required by Executive Order 13490, may accept an invitation for free attendance to the lunch.

However, NASA employees whose duties may substantially affect STA or the majority of its members, 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.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone