

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

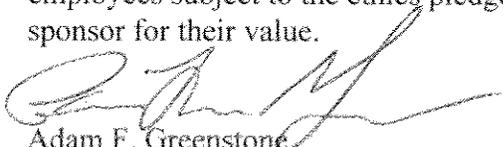
SUBJECT: Determination Regarding Attendance by NASA Employees at the Space Systems/Loral Cocktail Reception and Information Session at the American Geophysical Union Fall Meeting 2011 on December 7, 2011

On December 7, 2011, Space Systems/Loral is hosting a cocktail reception and information session at the American Geophysical Union Fall Meeting 2011, at the Marriott Marquis Hotel in San Francisco, California from 5:30 p.m. – 8:30 p.m. The purpose of this event is to provide a forum to discuss scientific instruments on geostationary communication satellites.

NASA personnel, academia, industry representatives, DARPA, and other Federal agencies will attend this event. About 20-30 people are expected to attend this event. The estimated cost of the refreshments, which includes all food and beverages, is \$40.00 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 this event 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 for themselves and their invited spouses or guests to the reception. However, NASA employees whose duties may substantially affect the sponsors, 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 serving in non-career positions for which the President's Executive Order of January 21, 2009, requires signing an ethics pledge must reimburse the event sponsors for any refreshments they consume.

The sponsors will also distribute small commemorative items worth less than \$10 in value. Attending NASA employees may accept these items so long as they will not have received more than \$50 in gifts from either of the sponsors during 2011, though non-career NASA employees subject to the ethics pledge may only accept these items if they reimburse the sponsor for their value.

  
Adam F. Greenstone