

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



February 15, 2012

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at a Reception hosted by the Space Transportation Association (STA) on February 15, 2012

On February 15, 2012, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue code, will reception at 253 Russell Senate Office Building in Washington, D.C., from 5 PM – 7 PM. The event will feature Johnson Space Center Director Mike Coats. His discussion will focus on various programs at JSC in 2012 and the future. 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 blue ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone