

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



June 1, 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 the Universities Space Research Association (USRA) Reception on June 5, 2012

On June 5, 2012, Universities Space Research Association (USRA), a 501(c)(3) organization under the Internal Revenue Code, will host a Reception from 5:00 p.m. - 7:30 p.m., at the USRA's offices in Washington, D.C. Attendees will be able to view the transit of the planet Venus across the Sun through an astronomical telescope. Another Venus transit will not occur again until the year 2117.

Approximately 62 individuals have been invited. Attendees will include employees from other federal agencies, legislative branch personnel, scientists, and representatives from academia and students. The estimated cost of the event, which includes all food and beverages, is \$50.00 per person.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is an Agency interest in NASA personnel attending the reception, which will provide the opportunity to share views on NASA's programs with counterparts from various communities in the setting of a rare astronomical event. Moreover, NASA employees whose duties do not substantially affect the event sponsor, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event for themselves and their invited guests.

However, NASA employees whose duties may substantially affect USRA, such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A blue ink signature of Adam F. Greenstone, written in a cursive style.

Adam F. Greenstone