National Aeronautics and Space Administration

Goddard Space Flight Center
Greenbelt, MD 20771

July 17, 2012

Reply to Attn of: 140

TO: Distribution

FROM: 140/Acting Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at Landsat 40th Anniversary Reception

On July 23, 2012, the Institute for Global Environmental Strategies (IGES) is hosting an event recognizing the 40th anniversary of Landsat, the premier space-based land observing program managed by NASA and the U.S. Geological Survey. The event will be held at the U.S. Capitol Rayburn Building, and include a reception and a program highlighting Landsat's 40 years of service. Speakers include several U.S. Congressmen and NASA Chief Scientist, Waleed Abdalati.

IGES is organizing the event, and Ball Aerospace, Orbital Sciences Corp., and Stinger Ghaffarian Technologies (SGT) are supporting the event. The estimated cost per person for the event is $40. Approximately 150 people are expected to attend from industry, academia, non-governmental organizations, the Federal government, and the U.S. Congress. Attendance at the event will allow NASA employees an opportunity to discuss Landsat's contributions to science and our understanding of the Earth with other attendees from government, universities, science organizations, and industry. I therefore conclude that NASA's interest in its employees attending this event outweighs any concern that attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Accordingly, NASA employees whose duties do not substantially affect Northrop Grumman may accept free attendance to the event for themselves and their guests. However, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of refreshments consumed by themselves and their accompanying guests. Moreover, NASA employees whose duties substantially affect any of the sponsors, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

Laura Giza