

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



September 17, 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 Space Policy Institute Dinner on September 18, 2012

On September 18, 2012, the Space Policy Institute of George Washington University's (GWU) Elliott School of International Affairs, a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Service Code, will hold the next of its continuing dinner discussions. This event will take place at the Primi Piatti Restaurant, 2013 I Street, N.W., Washington, D.C., from 7 p.m. to 9:30 p.m. The purpose of the event is to provide information exchange on space policy issues to be confronted by the next Congress.

The guest speaker for this event will be Jeff Bingham, the senior advisor for space and aeronautics to the Senate Committee on Commerce, Science and Transportation. Approximately 140 people were invited to attend, and 50 people are expected. Attendees will include NASA personnel and other federal agencies, congressional staff, media and representatives from foreign embassies, industry and academia. The estimated cost of the event, including all food and beverages, is around \$75 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. Attendance at the event will allow NASA attendees to exchange information on NASA's programs and policies. Accordingly, NASA employees whose duties do not substantially affect the 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 themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsor, 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.

*Kathleen T. Spear*

*for* Adam F. Greenstone