National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

September 19, 2012

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 Transportation Association (STA) Luncheon on September 21, 2012

On September 21, 2012, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a luncheon in the Rayburn House Office Building, Room 2325, in Washington, D.C., from 11:30 a.m. to 1 p.m. STA member organizations that support STA activities include Aerojet, ATK, Ball, Dynetics, Honeywell, ITT, Lockheed Martin, Orbital, Paragon, United Launch Alliance, United Space Alliance, and Wyle.

NASA Marshall Space Flight Center Program Manager Todd May will be speaking. Approximately 300 people have been invited to attend, including congressional staff, media representatives, of the aerospace industry, and employees of other Federal agencies. The estimated cost of the luncheon, including all food and beverages, is $25 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 regarding various NASA programs.

NASA employees – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 -- whose duties do not substantially affect the sponsors, may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

However, NASA employees whose duties may substantially affect the STA or a 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.

Adam F. Greenstone