National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

September 27, 2012

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the National Aeronautic Association's Monthly Luncheon on September 27, 2012

On September 27, 2012, the National Aeronautic Association (NAA), a non-profit organization organized under Section 501(c)(3) of the Internal Revenue Code, will hold its monthly luncheon, at the Crystal Gateway Marriott, in Washington, D.C. The NAA is a nonprofit organization which provides a forum for all members of the aviation/aerospace community to share information of common interest. The membership includes Congress, DoD, the FAA, NASA, aviation and aerospace manufacturers, airline officials, the media, and other individuals who have an interest in aviation.

The luncheon will be a widely attended gathering of over 500 people from all sectors of the aviation community and government. The approximate value of the luncheon is $60 per person. The NAA is solely responsible for selecting, inviting, and seating of NASA guests.

I find that the luncheon meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend this event so that NASA invitees may attend the event without charge. Accordingly, NASA employees, including non-career appointees subject to the Ethics Pledge in Executive Order 13490, whose duties do not substantially affect NAA may accept an invitation for free attendance to the luncheon for themselves and their spouses or guests.

NASA employees whose duties substantially affect NAA, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

for Rebecca Gilchrist

Adam F. Greenstone