

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



October 1, 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 Events Related to the 63rd International Astronautical Congress (IAC) in Naples, Italy, October 2012

Representatives from NASA have been invited to attend a series of events in conjunction with the 63rd International Astronautical Congress (IAC) at the Mostra d'Oltremare, in Naples, Italy. The IAC is intended to enable representatives from the space industry, space users, space policy makers, students, young professionals, researchers and academicians to meet and exchange experiences and knowledge on space-related topics, and to develop world-wide cooperation programs. The IAC is the largest annual event organized by the International Astronautical Federation (IAF), a non-governmental, non-profit membership organization, based in Paris, France. The Congress is hosted by one of the IAF's member countries, which forms a local organizing committee. The events are as follows:

1. Closing Dinner for the Space Generation Congress (SGC), September 29, 2012: The Space Generation Advisory Council (SGAC), a foreign, 501(c)(3) non-profit under the umbrella of the United Nations, will host a dinner at the Museo Archeologico Virtuale in Ercolano, Italy at 8:30 p.m. Lockheed Martin Space Systems is providing financial support for this dinner, although invitations are determined by SGAC. The dinner signifies the end of the Space Generation Congress, a conference focused on space topics taking place the week prior to the IAC. Approximately 200 people are expected to attend the dinner. Expected attendees include representatives from NASA, foreign government Agencies, foreign government officials, industry representatives, academia, and SGC delegates. The dinner will include food and beverages valued at approximately \$52 per person (40 €).
2. Young Professionals Program (YPP) Welcome Reception, September 30, 2012: Aerospace Corporation will sponsor a welcome reception in the Sala Ischia room at the Mostra d'Oltremare at 6:30 p.m. This event will provide networking opportunities for young space professionals. Approximately 150 people are expected to attend, including the younger representatives from governments, NASA personnel and other Federal agencies, industry, academia, students, media, and foreign nationals. The cost of food and refreshments is approximately \$17 per person.

3. Arianespace Reception and Dinner, October 1, 2012: Arianespace will be sponsoring a cocktail reception and dinner at the Sala Italia, at the Mostra d'Oltremare in Naples, Italy at 8:30 p.m. The event will provide employees an opportunity to discuss the U.S. space program with international gathering of attendees. Approximately 130 people have been invited. The cost per person is approximately \$58 per person. Attendees will include representatives from NASA, industry, foreign governments, and the heads of space agencies.
4. An Evening with Space Industry Executives, October 2, 2012: Lockheed Martin will sponsor an Evening with Space Industry Executives panel followed by a reception in the Sala Ischia room at the Mostra d'Oltremare at 6:30 p.m. The event is part of the Young Professionals Program (YPP). This event will provide an opportunity for young space professionals to hear more about future career paths in the space field. Approximately 150-200 people are expected to attend, including the younger representatives from governments, NASA personnel and other Federal agencies, industry, academia, students, media, and foreign nationals. The cost of food and refreshments is approximately \$30 per person.
5. Speed Networking Social, October 3, 2012: Arianespace and Boeing Company will be hosting a networking event and reception in the Sala Ischia room at the Mostra d'Oltremare at 6:30 p.m. The event is also part of the Young Professionals Program (YPP). The event will allow employees an opportunity to discuss the U.S. space program with their international counterparts. The cost per person is approximately \$25 per person. Approximately 150-200 people are expected to attend, including representatives from NASA and other Federal agencies, foreign space agencies, South African government officials, industry, and the media.

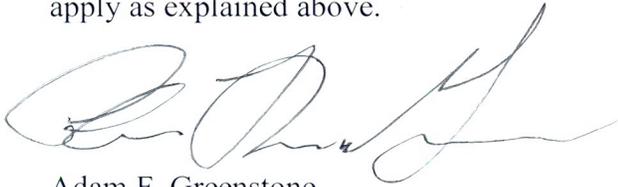
In accordance with 5 C.F.R. § 2635.204(g), and 14 C.F.R. § 1207.103, I find that the events listed above meet the definition of a "widely attended gathering."

I further find that there is an agency interest in having NASA employees attend the events, as they will have the opportunity to further agency programs and operations through the exchange of views and information with other attendees. Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect the sponsors listed above 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 the events from their local ethics counselor.

Moreover, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend the Evening with Space Industry Executives and the Speed Networking Social receptions if they reimburse the sponsors the cost of the refreshments consumed for them and accompanying guests. They may only attend the dinner sponsored by Arianespace on October 1, 2012 if they reimburse Arianespace for the cost of the dinner. They may, however, attend the SGAC Closing Dinner and the Young Professional Welcome Reception for free.

Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year). NASA invitees should not accept any gift items distributed at the reception, which exceed the \$20 cap, though non-career NASA employees may not accept gift items under the \$20 exception at events where ethics pledge restrictions apply as explained above.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', written in a cursive style.

Adam F. Greenstone