

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



March 15, 2013

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 Society of Satellite Professionals International (SSPI), 2013 Gala and Stellar Reception on March 19, 2013

On March 19, 2013, the Society of Satellite Professionals International (SSPI), a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Service Code, will host its 2013 Gala and Stellar Reception. The event will be held at Renaissance Hotel in Washington, D.C. from 6 PM to 8 PM. The purpose of the event is to honor government and military officials who have providing outstanding service to the U.S. governments using satellites.

Approximately 200 people were invited to attend. Attendees will include congressional staff representatives of industry, other federal agencies, and award winners and their guests. The estimated cost of the event, including all food and beverages, is around \$164.50 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 from the SSPI for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsor (SSPI), such as by way of procurement duties, of who receive 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.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone