

National Aeronautics and Space Administration

Headquarters  
Washington, DC 20546-0001



September 26, 2016

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the Embassy of Finland Reception on September 29, 2016

On September 29, 2016, Vaisala, Inc. will host a reception at the Embassy of Finland in Washington, DC at 6:30 p.m. The purpose of the event is to provide an opportunity for a panel discussion on "The Weather and Climate Enterprise 2025".

Approximately 35 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$25.00 per person. The Embassy of Finland will organize and plan the event and will be in control of the seating. The event will be attended by personnel from other Federal agencies, academia, and the public. I find that the event 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 the event because it will further Agency programs and operations. Attendance at the reception will allow NASA representatives to exchange views and ideas with others in attendance. Accordingly, NASA employees whose duties do not substantially affect the Vaisala, Inc. – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – may accept an invitation from the Embassy of Finland for free attendance to the reception.

Moreover, NASA employees whose duties may substantially affect the Vaisala, Inc., such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

*for Adam F. Greenstone*  
Adam F. Greenstone