

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



October 10, 2015

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 65th International Astronautical Congress (IAC) in Jerusalem, Israel, October 10-15, 2015

Representatives from NASA have been invited to attend a series of events in conjunction with the 66th International Astronautical Congress (IAC) at the ICC Conference Centre, in Jerusalem, Israel. 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. Dinner for the Space Generation Congress (SGC), October 10, 2015: 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 Belgium house, Edmond J. Safra Campus, Jerusalem, at 8:00 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 three days prior to the IAC. The NASA Administrator, Charles F. Bolden, Jr. will be the keynote speaker at the event. Approximately 220 people are expected to attend the dinner. Expected attendees include representatives from NASA, foreign government Agencies, foreign government officials, industry representatives, academia, students and young professionals, and members of the public. The dinner will include food and beverages valued at approximately \$100 per person.
2. Reception at Israel Aerospace Industries, Ltd., October 12, 2015: Israel Aerospace Industries Ltd. (IAI) will host a reception at the IAI Space Center, at 8:00 p.m. The reception will provide an opportunity for participants from the Heads of Ministry Science, Technology and Space, the Israel Space Agency,

industry, academia, and the media to discuss matters relating to Space and Technology. Approximately 300 people are expected to attend. The reception will include food and beverages valued at approximately \$30 per person.

3. Breakfast with Women in Aerospace – Europe, October 14, 2015: Women in Aerospace (WIA) – Europe, a foreign, 501(c)(3) non-profit under the umbrella of the United Nations, and the IAF will host a breakfast at the Crowne Plaza, at 7:00 a.m. The breakfast will provide discussion on space technology topics. The NASA Deputy Administrator, Dava Newman will be the keynote speaker at the event. Approximately 150 people are expected to attend, including NASA personnel and other Federal agencies, industry, academia, students, media, and foreign nationals. The cost of the food and beverages is approximately \$23 per person (20€).

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 reception on October 14, 2015 which is sponsored by Lockheed Martin if they reimburse the sponsor for the cost of the reception for themselves and any invited guests. They may, however, attend the Member of Parliaments Dinner on October 11, the IAI reception on October 12, and the WIA-Europe Breakfast on October 14, for free¹. In addition, the Administrator and Deputy Administrator may accept free attendance at the events at which they are speaking.

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

¹ In addition, invited employees, including non-career employees, may accept free attendance at the following events which are covered by the IAC registration fees or based on the exception for gifts and refreshments, and entertainment in foreign areas in 5 CFR §2635.204(i): Young Professionals events (including the Welcome Reception, Hubble Program and the Joint Networking Reception), VIP coffee, VIP lunches, and the Heads of Agency lunch.

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 'A. F. Greenstone', written in a cursive style.

Adam F. Greenstone

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Addendum added on October 13, 2015:

1. Reception at Tower of David, October 14, 2015: Lockheed Martin Israel will host a reception at the Tower of David in Jerusalem, at 7:30 p.m. The reception will provide discussion on space technology topics. Approximately 150 people are expected to attend, including NASA personnel, Heads of Industry, other Federal agencies, and Embassy personnel. The cost of the food and beverages is approximately \$150 per person. 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 reception on October 14, 2015 which is sponsored by Lockheed Martin if they reimburse the sponsor for the cost of the reception for themselves and any invited guests.

APG, 10/13/15