

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



December 2, 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 Space Systems Loral Reception on December 14, 2015

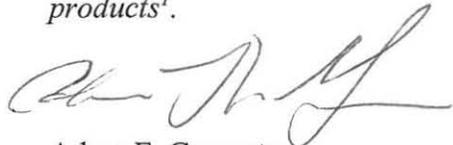
On December 14, 2015, in conjunction with the AGU Fall Meeting 2015, Space Systems Loral (SSL) will host a reception at the Marriott Marquis Hotel in San Francisco, CA at 5:00 p.m. The event is to provide a forum for informal discussions regarding putting scientific instruments on geostationary communication satellites as well as other related topics of interest in the science community.

Approximately 200 people have been invited to attend, including representatives from other Federal agencies, academia, members of industry and science community. The estimated cost of the reception, including all food and beverages, is \$40.00 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 free attendance at the above mentioned event is in the interest of the agency because it will further agency programs and operations. Attendance at this event will allow NASA attendees to exchange information regarding NASA's missions and programs. Accordingly, NASA employees, whose duties do not substantially affect SSL, may accept an invitation for free attendance to the reception. However, 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 if they reimburse the host the value of the reception.

Moreover, NASA employees whose duties may substantially affect SSL, such as by way of contracting duties, 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 to attend under the widely attended gathering exception.

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). We understand that SSL will be distributing a slide ruler (valued at \$2.00), a ball point pen (valued at \$1.00), a USB memory device (valued at \$5.00), and a holiday calendar (valued at \$3.00) for a total value of \$11.00 worth of SSL products¹.



Adam F. Greenstone

¹ Non-career NASA employees subject to the ethics pledge must reimburse SSL which is a lobbying organization for purposes of the ethics pledge the full value of any such gift items accepted even if these monetary caps are not exceeded.