

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



April 13, 2014

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at a National Aeronautic Association Reception co-sponsored by Northrop Grumman, Rolls-Royce, North America, Dell, Pratt and Whitney, GE Aviation, Rockwell-Collins, GKN Aerospace and Wind River on May 29, 2014

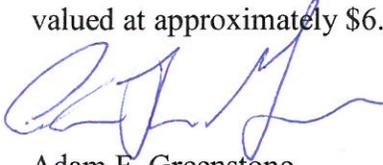
On May 29, 2014, National Aeronautic Association, a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Code, will host the presentation of the 103rd Collier Trophy National Aeronautic Association Reception. Sponsors that support the event, which is administered and controlled by the host, include Northrop Grumman, Rolls-Royce, North America, Dell, Pratt and Whitney, GE Aviation, Rockwell-Collins, GKN Aerospace and Wind River. This event will take place at Hangar 7, Ronald Reagan Washington National Airport at 6:30 p.m. The purpose of this event is to present the Robert J. Collier Trophy and bring together industry professionals to facilitate discussions about the technical, scientific, and policy challenges of the aerospace community.

Approximately 1,000 people have been invited to attend, including Congressional members and staff, Defense personnel, industry professionals, and National Aeronautic Association members. The estimated cost of the event, including all food and beverages is \$140.00 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 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 aerospace and exploration programs with interested representatives of significant communities. 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 for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the event host or a majority of the sponsors, 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 this event from their local ethics counselor.

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 gifts will be distributed to the attendees valued at approximately \$6.



Adam F. Greenstone