



August 30, 2013

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the Space Transportation Association (STA) Roundtable on September 17, 2013

On September 17, 2013, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will sponsor a roundtable at Aerojet Rocketdyne, 1300 Wilson Boulevard, Suite 1000, Rosslyn, Virginia, from 3 PM to 5 PM.

STA member organizations that support STA activities include Aerojet Rocketdyne, ATK, Dynetics, Honeywell, ITT Exelis, L-3 Communications, Lockheed Martin, Orbital, Teledyne Brown Engineering, and ULA.

Approximately 300 people have been invited to attend, including representatives from NASA, DoD, FAA, the White House, members from Congress, congressional staff, industry, and media. The estimated cost of the event, including all food and beverages, is \$5 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).

The roundtable discussion on lessons learned from DC-X includes panel participant, Dan Dumbacher, Deputy Associate Administrator for Exploration Systems Development, NASA. 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 regarding various NASA programs.

Accordingly, NASA employees – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – whose duties do not substantially affect the sponsors may accept an invitation for free attendance to the reception for themselves and their invited spouses or guests.

Moreover, NASA employees whose duties may substantially affect the STA or a majority of its members, 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.

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

Adam F. Greenstone