

National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



December 4, 2013

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 Transportation Association (STA) Luncheon on December 4, 2013

On December 4, 2013, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a luncheon in the House Office Building, Rayburn B-339, Washington, D.C., from 11:30 a.m. to 1:00 p.m. STA member organizations that support STA activities include Aerojet Rocketdyne, ARES, ATK, Dynetics, Honeywell, L-3 Communications, Lockheed Martin, Orbital, SAIC, Sierra Nevada, Teledyne Brown Engineering, United Launch Alliance, and UTC Aerospace.

Robert Lightfoot, NASA Associate Administrator, will provide a year-end review and discuss prospects for NASA and Space in 2014. Approximately 300 people have been invited to attend, including Congressional staff, media, aerospace industry representatives, and employees of other Federal agencies. The estimated cost of the luncheon, including all food and beverages, is \$20 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 regarding various NASA programs.

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 luncheon for themselves.

However, 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