

National Aeronautics and Space Administration

**Mary W. Jackson Building NASA Headquarters**  
Washington, DC 20546-0001



October 29, 2021

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 Closing Gala Dinner of the 69th International Astronautical Congress (IAC) in Dubai, United Arabs Emirates, October 25 - October 29, 2021

Representatives from NASA have been invited to attend a series of events in conjunction with the International Astronautical Congress (IAC) in Dubai, United Arab Emirates. 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 Agency previously issued a widely-attended gathering determination on October 22, 2021 for a number of events occurring at the IAC.

The IAC will also hold the Closing Gala Dinner on October 29, 2021 at the Armani Hotel, Dubai at 7:00 p.m. to 11:00 p.m. Yahsat Company is providing financial support for this dinner, although the planning, organizing, and invitations are determined by the IAF and the Mohammed Bin Rashid Space Centre (MBRSC). The dinner signifies the end of the IAC. Approximately 400 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 \$197 per person.

In accordance with 5 C.F.R. § 2635.204(g), and 14 C.F.R. § 1207.103, I find that this event meets 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 – including NASA employees who are in

non-career positions that require they sign an ethics pledge under Executive Order 13989 – who have been invited to attend may accept free attendance for themselves and a guest to this event.

However, NASA employees who have a significant role in any pending matter affecting the host of an event in this determination, such as procurement duties, program management, or negotiating or administering a Space Act Agreement, should seek a separate determination from their local ethics counselor as to whether they may accept an invitation of free attendance.

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 that exceed the \$20 gift exception limit.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', written in a cursive style.

Adam F. Greenstone