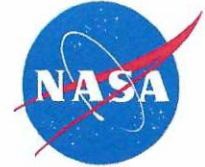


National Aeronautics and Space Administration

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



October 22, 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 Events Related to the 69th International Astronautical Congress (IAC) in Dubai, United Arabs Emirates, October 25 - October 29, 2018

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 events are as follows:

1. Space Generation Congress (SGC) Dinner, October 23, 2021: The Space Generation Advisory Council (SGAC), a foreign, 501(c)(3) non-profit under the umbrella of the United Nations, will host a dinner at the Sahara Desert Resort, Dubai at 7:00 p.m. to 10:00 p.m. Lockheed Martin Space Systems is providing financial support for this dinner, although invitations are determined by SGAC. The dinner signifies the end of the Space Generation Congress, a conference focused on space topics taking place three days prior to the IAC. Approximately 250 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 \$150 per person.
2. The IAC VIP Dinner, October 25, 2021: The IAC will host a reception at the Etihad Museum, Dubai at 5:30 p.m. to 9:00 p.m. Approximately 200 people are expected to attend, including NASA personnel and other Federal agencies, industry, and state and

local federal officials. The reception will include food and beverages valued at approximately \$70 per person. NASA Employees may only accept the tangible gift being handed out at the event if they pay full market value of \$40

3. Voyager Space Reception, October 26, 2021: The Voyager Space Holdings (VSH) will host a reception at the Hyatt Regency Dubai Creek at 6:00 to 8:30 p.m. The reception will provide an opportunity for participants from the legislative branch, NASA, foreign government agencies, foreign government officials, and industry representatives to discuss the space programs. Approximately 125 people are expected to attend. The reception will include food and beverages valued at approximately \$35 per person.

In accordance with 5 C.F.R. § 2635.204(g), and 14 C.F.R. § 1207.103, I find that the events listed above meet 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 who have been invited to attend may accept free attendance at these events.

NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13989 may attend the Space Generation Congress Dinner on October 23, the IAC VIP Dinner on October 25, the Voyager Space Holdings Reception on October 26¹, the IAC 2022/ Paris, France Kick-off Event on October 27, and the IAC Science Leaders Reception on October 28, for free.² In addition, NASA Employees may accept free attendance at the events at which they are speaking.

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

¹ Guests of invited employees are included in the invitation for Space Generation Congress Dinner, the IAC VIP Dinner, and The Voyager Space Holdings Reception.

² In addition, invited employees, including non-career employees, may accept free attendance at the following events which are covered by the IAC registration fees or based on the exception for gifts and refreshments, and entertainment in foreign areas in 5 CFR §2635.204(i): IAC Opening Ceremony, IAC Welcome Reception, Young Professionals events, VIP coffee, the VIP luncheon, and an OHB Systems AG-provided lunch. The following may be accepted under the Foreign Gifts and Decorations Act: the European Space Agency Lunch, the IAC 2022 Launch Reception, the IAC Science Leaders Reception, and the German Night Reception held by DLR.

distributed at the reception that exceed the \$20 cap, though non-career NASA employees subject to the ethics pledge of Executive Order 13989 may not accept gift items from lobbyists or registered lobbying organizations under the \$20 exception.

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

Adam F. Greenstone