

National Aeronautics and  
Space Administration

**Lyndon B. Johnson Space Center**  
2101 NASA Parkway  
Houston, Texas 77058-3696



November 13, 2019

Reply to Attn of : AL-19-070

TO: Distribution

FROM: AL/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at the Space Commerce Conference and Exposition (SpaceCom) Networking Reception

On Tuesday, November 19, 2019, the SpaceCom Networking Reception, sponsored by National Trade Productions, Inc. (NTP), will be held at George R. Brown Convention Center in Houston, Texas. NTP produces and manages proprietary events, as well as trade shows for their clients across diverse market segments. NTP has actively organized and planned SpaceCom and various events connected with SpaceCom. SpaceCom is a two-day event designed to be a catalyst for innovation and growth in the commercial development of space. It is engineered to fuel business innovation across the aerospace, medical, energy, transportation, maritime, communications and advanced manufacturing industries. The networking reception follows the SpaceCom Entrepreneur Summit Workshop and the GSA Commercial Spaceport Summit, which are held the day before SpaceCom. The reception includes food and beverages. Invitees from NASA are members of the Agency Partnerships Office Roundtable


Reception invitees other than NASA employees will include students, educators, members of the Global Spaceport Alliance, and attendees of the SpaceCom Entrepreneur Summit. This event is by invitation only and approximately 100 people are expected to attend. The approximate value per attendee is \$17.00 per person for food and beverages. There is an Agency interest in having NASA personnel attend this reception because permits attendees to meet in an informal setting and share ideas and viewpoints pertaining to NASA's policies, programs, and operation. It also provides attendees the opportunity to discuss common issues and solutions across disparate industries and NASA goals and objectives related to the commercialization of space.

This event is of interest to NASA and will serve as a forum for facilitating the widest practicable dissemination of information concerning the Agency and its activities. This event will further agency programs or operations including promoting community relations and providing the opportunity for the exchange of views and information between leaders within the agency and leaders within the community. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g)(2).

It is my determination that it is in the Agency's interest for NASA invitees to attend the reception. Their attendance outweighs any concern that the acceptance of any benefits may, or may appear to, improperly influence them in the performance of their official duties.

Accordingly, NASA invitees whose duties do not substantially affect NTP are authorized to attend and to accept any food and beverages offered in conjunction with this event.

However, NASA employees who have a significant role in any pending sensitive matter that will substantially affect the interests of NTP, such as procurement duties, program management, or negotiating a Space Act Agreement, and NASA employees who have non-career political appointments, should seek a separate determination from their local ethics counselor as to whether they may accept the invitation.



Theodore U. Ro

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See List