

National Aeronautics and
Space Administration
Lyndon B. Johnson Space Center
2101 NASA Road 1
Houston, Texas 77058-3696



November 7, 2019

Reply to Attn of: AL-19-069

TO: Distribution

FROM: AL/Chief Counsel

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

On Wednesday, November 20, 2019, the SpaceCom VIP reception will be held at Partnership Tower, in Houston, Texas. 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 VIP reception will be held on the first day of SpaceCom. The reception includes food, alcoholic beverages, and brief welcoming remarks from the sponsors. The sponsors of the reception are Winstead P.C., the Greater Houston Partnership, HoustonFirst, BWX Technologies, the Italian Trade Agency – Houston, and the Bay Area Houston Economic Partnership. Invitees from NASA are members of the SpaceCom Advisory Board, speakers, presenters and senior NASA managers.

Reception invitees other than NASA employees will include industry leadership, researchers, technologists, members from academia, and federal, state and local government officials. This event is by invitation only and approximately 250 people are expected to attend. The approximate value per attendee is \$50.00 per person for food and alcoholic beverages. The reception permits attendees to meet in an informal setting and share ideas and viewpoints on a variety of NASA topics. It also provides the opportunity for NASA attendees 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 Winstead P.C., the Greater Houston Partnership, HoustonFirst, BWX Technologies, the Italian Trade Agency – Houston, and the Bay Area Houston Economic Partnership are authorized to attend and to accept any food and alcoholic beverages offered in conjunction with this event.

Those NASA employees whose duties may substantially affect Winstead P.C., the Greater Houston Partnership, HoustonFirst, BWX Technologies, the Italian Trade Agency – Houston, and the Bay Area Houston Economic Partnership, or who are in non-career positions for which Executive Order 13490 of January 21, 2009 requires signing an ethics pledge, are not covered by this determination and should see an individualized ethics determination from the Office of Chief Counsel regarding participation in this event pursuant to 5 C.F.R. §2635.204(g)(2).



11/7/2019

Theodore U. Ro

Distribution:

AA/M. S. Geyer
AA/V. E. Wyche
AA/D. M. Shafer
AD/D. A. Conder
AH/A. H. Roemer
AJ/D. H. Urbanski
BA/D. L. Johnson
CA/S. A. Koerner
EA/K. N. Window
GA/M. A. Kirasich
IA/A. M. Moore
JA/J. B. Walker
LA/S. H. Schmidt
NA/W. R. DeLoach
OA/K. A. Shireman
RA/R. M. Cort
SA/C. A. Koerner
VA/J. S. Stich
XA/J. A. McCullough

cc:

W-JS/L. M. Atkinson
WR/C. R. Lamb