

National Aeronautics and
Space Administration



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

March 17, 2022

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the Satellite Industry Association Dinner on March 21, 2022

On March 21, 2022, the Satellite Industry Association (SIA), a not-for-profit organization under Section 501(c)(6) of the Internal Revenue Service Code, will hold a dinner at The International Spy Museum in Washington, DC, from 6:30 p.m. to 9:30 p.m. SIA is in control of the planning, organizing, and issuing invitations for this event. The event will provide an opportunity to discuss the highlights and roles that satellite technologies play in the nation's economy and national security.

Approximately 200 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, members of the legislative branch, and representatives from industry. The estimated value of the event, including all food and beverages, is approximately \$185 per person. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. 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 provide an opportunity for the invited persons to exchange ideas and views pertaining to NASA's policies, programs and operations. NASA employees — including NASA employees in non-career positions who are required to sign an ethics pledge under Executive Order 13989 — who do not have a significant role in a matter affecting the interests of SIA may accept an invitation for free attendance to the event. In those circumstances, I find that the Agency's interest in attendance outweighs any concern that the individual may be, or may appear to be, improperly influenced in the performance of their duties.

However, NASA employees who have a significant role in any pending matter affecting the interests of the sponsor, 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 the invitation.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone