

National Aeronautics and Space Administration

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



October 11, 2024

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 75th International Astronautical Congress (IAC) in Milan, Italy,
October 14 – October 18, 2024

Representatives from NASA have been invited to attend a series of events in conjunction with the International Astronautical Congress (IAC) in Milan, Italy. 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 Milan, Italy. 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 Advisory Council (SGAC) Dinner, October 12, 2024, 7-11:30 PM: The Space Generation Advisory Council (SGAC), a non-profit organization under Section 501(c)(3) of the IRS Code, will host a reception and gala dinner at Hotel Palazzo Parigi, Milan. The annual SGC Closing Dinner is the highlight of SGAC's events, allowing SGAC to celebrate what they have achieved over the past year. Approximately 350 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 \$219.54 (200 Euros) per person. The event is by invitation only.
2. IAF and AIDAA Monday VIP Gathering, October 14, 2024, 8:30 – 9:15 AM: The IAF and AIDAA will host a joint gathering at the Gold Room Lounge, Level +2, South Wing, MiCo, Milan, Italy. The gathering will provide an opportunity for participants from industry, the international space community, and those attending the International Astronautical Congress to exchange views and information with other attendees. The reception will include food and beverages. This event is by invitation only.

3. Voyager Space and Virgin Galactic Reception, October 14, 2024, 8:00 – 10:00 PM: Voyager Space and Virgin Galactic will host a joint reception at GinO12, Alzaia Naviglio Grande, 12, 20144, Milan MI, Italy. The reception will provide an opportunity for participants from industry, the international space community, and those attending the International Astronautical Congress to exchange views and information with other attendees. Approximately 75 people are expected to attend. The reception will include food and beverages valued at approximately \$25 per person. This event is by invitation only.
4. Abu Dhabi Space Debate Business Gala Dinner, October 14, 2024, 7:00 PM – 8:30 PM: The UAE Space Agency is hosting a dinner for the Abu Dhabi Space Debate foreign, a non-profit organization at Palazzo Parigi, Milano. The event will allow representatives from NASA to exchange views and information with other attendees, including foreign government agencies, foreign government officials, industry representatives, academia, students and young professionals, and members of the public. Approximately over 200 people are expected to attend. The event is by invitation only.
5. The Italian Space Agency and Thales Alenia Space Gala Dinner, October 14, 2024, 8:30 PM: The Italian Space Agency and Thales Alenia Space will host a dinner at Sala delle Otto Colonne, Palazzo Reale, Piazza Duomo No.2, Milano. Approximately 110 people have been invited, including representatives from NASA, other international space agencies, industry, and academia. The reception will include food and beverages valued at approximately \$131.66 (120 Euro) per person. The event will allow representatives from NASA to exchange views and information with other attendees. Guests are invited.
6. NL Space VIP Reception, October 15, 2024, 6:30 – 9:00 PM: The Consulate General of the Kingdom of the Netherlands in Milan and the Dutch Space Delegation, will host a reception at Palazzo Clerici, Via Clerici, 5, 20121 Milan, IT. The event will allow representatives from NASA to exchange views and information with other attendees, including foreign government agencies, foreign government officials, industry representatives, academia, students and young professionals, and members of the public. Approximately 800 people are expected to attend.
7. German Night 2024 Reception, October 15, 2024, 7:00 PM – 12 AM: The German Space Agency (DLR) will host a reception at Garage Italia Milano, Piazzale Francesco Accursio, 22, 20151 Milano. The event will allow representatives from NASA to exchange views and information with other attendees, including foreign government agencies, foreign government officials, industry representatives, academia, students and young professionals, and members of the public. Approximately 800 people are expected to attend.
8. Voyager Space Reception, October 16, 2024, 6:30 PM: Voyager Space, Starlab, and Hilton will host a joint reception at the Villa Clerici, Via Giovanni Terruggia, 8/14, 20162, Milano MI, Italy. The reception will provide an opportunity for participants from industry, the international space community, and those attending the International Astronautical Congress to exchange views and information with other attendees.

Approximately 150 people are expected to attend. The reception will include food and beverages valued at approximately \$145 per person. This event is by invitation only. Guests are invited.

9. Embassy of Norway in Rome Reception, October 16, 2024, 7:30 PM: The Norwegian Embassy in Rome and the Director General of the Norwegian Space Agency (Innovation Norway, Kongsberg Defense and Aerospace, KSAT, and NAMMO are sponsors) will host a reception at Palazzo Reale, Piazza Duomo 14, Milano. Approximately 130 people have been invited, including representatives from NASA, other international space agencies, industry, and academia. The reception will include food and beverages valued at approximately \$65.81 (60 Euros) per person. The event will allow representatives from NASA to exchange views and information with other attendees. This event is by invitation only.
10. Axiom Space AxEMU Suit Reveal VIP Dinner, October 17, 2024, 7:00 PM: The Axiom Space (co-sponsored by Prada) will host a dinner at Ristorante Torre, Via Lorenzini 14, Milan, Italy. Approximately 150 people have been invited, including representatives from NASA, other international space agencies, industry, and academia. The reception will include food and beverages valued at approximately \$100 per person. The event will allow representatives from NASA to exchange views and information with other attendees. Guests are invited.
11. IAC Closing Gala Dinner, October 18, 2024, 7:30 PM: The IAC will host a fashion show dinner at the Gold Room Lounge, Level +2, South Wing, MiCo, Milan, Italy. The gathering will provide an opportunity for participants from industry, the international space community, and those attending the International Astronautical Congress to exchange views and information with other attendees. Approximately 800 people are expected to attend. The reception will include food and beverages valued at approximately \$218.66 (200 Euro) per person. This event is by invitation only.

In accordance with 5 C.F.R. § 2635.204(g), and 14 C.F.R. § 1207.103, I find that the event 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 by the hosts, and if also invited their guests, may accept free attendance at these events.¹ NASA

¹ 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): the IAF Opening Ceremony, Welcome Reception, breakfasts (Industry, 3G, Academy and IAF), VIP luncheons, Host Summit Lunch, IAF Science and Academic Luncheon, VIP Gathering, IDEA 3G+ Diversity Luncheon and VIP Luncheon. The following may be accepted in whole or part under the Foreign Gifts and Decorations Act: Abu Dhabi Space Debate Business Gala Dinner (10/14), The Italian Space Agency and Thales Alenia Space Gala Dinner (10/14), NL Space VIP Reception (10/15), and the Embassy of Norway in Rome Reception (10/16).

employees who are invited by a party other than the event host(s) should seek separate advice from their local ethics official.

However, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13989 may only attend the Voyager Space and Virgin Galactic Reception (10/14), the Voyager Space Reception (10/16); and the Axiom Space AxEMU Suit Reveal VIP Dinner (10/17) if they reimburse the hosts the market value of the event to attend. 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 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.

For Adam F. Greenstone