

National Aeronautics and
Space Administration



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

March 6, 2025

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the 2025
Satellite Conference & Exhibition (Access Intelligence LLC) on March 10-13,
2025

The Satellite Conference & Exhibition will hold an event on March 10-13, 2025, starting at 8:00 a.m. on March 10th, at the Walter E. Washington Convention Center, Washington, DC. Access Intelligence, LLC. is in control of the planning, organizing, and issuing invitations for this event. The purpose of the event is to bring key industry leaders, policymakers, and innovators together to network, explore business opportunities, share new products and innovations, and discuss future challenges and solutions within the space and satellite sectors.

Approximately 14,000 people are expected to attend the event. Attendees will have a diversity of views or interests and will include members of Congress, Executive Office of the President staff, trade association representatives, personnel from other federal agencies, members of the legislative branch, and representatives from media, and industry. The estimated value of an Exhibit Hall Pass for the conference & exhibition is between \$0 and \$299 depending on the time of registration. 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 who do not have a significant role in a matter affecting the interests of the host 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.

Additionally, NASA employees who have a significant role in any pending matter affecting the interests of the host, 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. *Moreover, this determination addresses invitations NASA employees to attend events covered by an*

Exhibit Hall Pass. NASA employees who receive an invitation covering events beyond those to which an Exhibit Hall Pass gains admission should seek a separate determination from the local ethics official to attend events not covered by an Exhibit Hall Pass.

Adam F. Greenstone