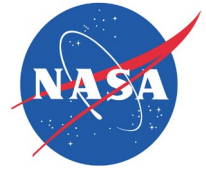


National Aeronautics and
Space Administration

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



February 2, 2026

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the Chamber of Commerce Summit on February 2, 2026

On February 2, 2026, the United States Chamber of Commerce (CofC), a 501(c)(6) business organization, will host a summit at its office location, 1615 H St. NW, Washington, DC, from 9:00 a.m. – 6:00 p.m.

Approximately 150 people have been invited to attend. Attendees will have a diversity of views or interests and will include representatives from a range of companies in the Earth Observation (EO) capabilities and products industry. The estimated cost of the event, including all food and beverages, is \$ 50 per person. CofC has sponsors for the food and they are: MDA Space, Pixxel, SkyFi, ICEYE US, and Planet Labs (collectively, “food sponsors”).

CofC is in control of the organizing and planning for this event. 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 sponsor may accept an invitation for free attendance for themselves 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 CofC , 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.

Adam F. Greenstone