

National Aeronautics and
Space Administration
Headquarters
Washington, DC 20546-0001



September 17, 2004

Reply to Attn of:

Office of the General Counsel

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Blanket Determination Regarding Attendance by NASA Employees at a Luncheon Sponsored by the National Capital Section of the American Institute of Aeronautics and Astronautics (AIAA) on September 30, 2004

On September 30, 2004, the National Capital Section of the AIAA will host its monthly luncheon at the Pier 7 Channel Inn, Washington, D.C. Dr. Richard Vondrak, Director of the Robotic Lunar Exploration Program and Science Mission Director, will be the featured luncheon speaker; he will discuss the Robotic Lunar Exploration Program.

The event will be widely attended by officials from other Federal agencies, members of Congress and their staffers, representatives from the aerospace industry and various aerospace associations, and private law firms. The estimated cost of the event, which includes all food and beverages, is \$45 per person. Approximately 100 people are expected to attend the luncheon. The event will allow NASA employees the opportunity to discuss with other guests the various aspects of the Robotic Lunar Exploration Program. As such, I find that the luncheon meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I, therefore, conclude that NASA's interest in its employees attending this event outweighs any concern that free attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Accordingly, NASA invitees and their spouses or guests may attend the luncheon hosted by the National Capital Section of the AIAA on September 30, 2004.

A handwritten signature in black ink, appearing to read "R. Andrew Falcon", with a long horizontal line extending to the right.

R. Andrew Falcon