

Headquarters

Washington, DC 20546-0001



November 5, 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 with the ASTM Chairman of the Board, November 9, 2004

On November 9, 2004, a luncheon will be held by ASTM International (formerly American Society for Testing and Materials) at the Omni Shoreham Hotel, Washington, DC. ASTM is a not-for-profit organization that provides a forum for the development and publication of voluntary consensus standards for materials, products, systems and services. It has been determined to be in the best interest of the Government for those NASA employees who are invited to this event to attend in their official capacities and as representatives of NASA.

The event will be a widely attended gathering of approximately 50 persons. Officials from other Federal agencies, chairmen of various ASTM technical committees (all of whom are industry representatives), and top officials from ASTM will attend the event. The estimated cost of the luncheon, which includes food and beverages, is \$40. The luncheon will offer an opportunity for participants to voice issues and concerns relative to federal agency and ASTM interaction. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Consequently, I conclude that NASA's interest in its employees attending this event outweighs any concerns that free attendance may, or may appear to, improperly influence any NASA employee in the performance of their official duties.

Accordingly, NASA invitees may attend the luncheon without charge.

A handwritten signature in black ink, appearing to read "R. Andrew Falcon", written in a cursive style.

R. Andrew Falcon