



September 30, 2004

Reply to Attn of: **Office of the General Counsel**

TO: Distribution

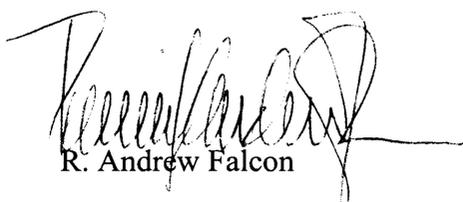
FROM: Alternate Designated Agency Ethics Official

SUBJECT: Blanket Determination Regarding Attendance at the National Space Club Fall Luncheon, October 7, 2004

On October 7, 2004, the National Space Club (NSC) will host its fall luncheon, at the Loew's L'Enfant Plaza Hotel, Washington, D.C. The Honorable Conrad C. Lautenbacher, Jr., is Undersecretary of Commerce for Oceans and Atmosphere and NOAA Administrator. Mr. Lautenbacher will discuss the International Global Earth Observing System of Systems, Research to Operations (NOAA's position relative to NASA Earth Science), and GOES-R. 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 widely attended by officials from other Federal agencies, members of Congress and their staffers, the military, representatives from the aerospace industry and various aerospace associations. The estimated cost of the event, which includes all food and beverages, is \$60 per person. Approximately 120 people are expected to attend. The event will allow NASA employees an opportunity to discuss common issues and interests with other guests. 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 NSC on October 7, 2004.


R. Andrew Falcon