

National Aeronautics and
Space Administration

Headquarters

Washington, DC 20546-0001



August 19, 2004

Reply to Attn of:

Office of the General Counsel

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Spacehab Toast to Twenty Celebration, August 26, 2004 and September 2, 2004

Spacehab, Inc. will host its "Toast to Twenty" celebration on August 26, 2004, at the Spacehab Payload Processing Facility in Cape Canaveral, Florida. A subsequent reception will also take place on September 2, 2004, in Houston, Texas. Spacehab has invited customers, employees and associates to celebrate its growth and success over the past two decades. 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.

This event will be widely attended by officials from other federal and state agencies, members of academia and the media, and representatives of local businesses and space industry. Approximately 100 people are expected to attend the event in Cape Canaveral and 175 are expected to attend the event in Houston. This event will provide NASA attendees the opportunity to meet with representatives from industry and academia regarding space exploration and payload processing. The estimated cost of the event, which includes the reception and memorabilia, is \$16 per person. I find these events meet the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g). Consequently, I conclude that NASA's ongoing interest in the dissemination of information concerning its activities and in discussion of topics related to space exploration outweighs any concerns that free attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Accordingly, NASA invitees may attend this event without charge.

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

R. Andrew Falcon