

National Aeronautics and  
Space Administration

**Headquarters**

Washington, DC 20546-0001



September 14, 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 the Washington Space Business Roundtable Luncheon, September 21, 2004

On September 21, 2004, the Washington Space Business Roundtable (WSBR), will host a luncheon at the University Club. I have determined it to be in the best interests of the Government for those NASA employees who are invited to the luncheon to attend in their official capacities and as representatives of NASA.

David Radzanowski, Branch Chief Science and Space Programs Branch, Office of Management, will be the featured luncheon speaker; his presentation topic is "Space Funding: Will Congress Support the New Space Exploration Vision?" Officials from other Federal agencies, members of Congress and their staffers, media, and representatives from the aerospace industry, will attend the luncheon. The WSBR expects 70 or more individuals to attend. The estimated cost of the luncheon, which includes all food and beverages, is \$40 per person. As such, I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). Attendance at the luncheon will provide NASA employees the opportunity to discuss space related issues and concerns. 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 WSBR on September 21, 2004, free of charge.

A handwritten signature in black ink, appearing to read "R. Andrew Falcon", written over a horizontal line.

R. Andrew Falcon