

National Aeronautics and
Space Administration

Lyndon B. Johnson Space Center
2101 NASA Parkway
Houston, Texas 77058-3696



June 7, 2007

Reply to Attn of:

AL-07-089

TO: Distribution

FROM: AL/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Approval
for JSC Employees with Senior Institutional or Project Responsibilities
to Attend a Pre-launch Reception sponsored by Pratt-Whitney Rocketdyne

In accordance with 5 CFR. § 2635.204(g)(2) and (3), I make the following determination:

Certain JSC employees with senior institutional or project responsibilities have been invited to attend a pre-launch reception sponsored by Pratt-Whitney Rocketdyne at the Doubletree Hotel Cocoa Beach, Florida, on Friday, June 8, 2007, from 9:00 p.m. – 11:00 p.m. This event is to be held in conjunction with the launch of STS-117, at the Kennedy Space Center.

This event will be a widely-attended gathering of aerospace industry representatives, Federal and State officials and other community leaders. The reception is valued at \$25 per person and approximately 150 - 200 individuals have been invited to attend. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g)(2).

Pratt-Whitney Rocketdyne is currently involved in the Space Shuttle program, and other significant contractual matters relating to NASA. Some JSC personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to Pratt-Whitney Rocketdyne's business interests.¹ These personnel are similarly situated in that they each have senior institutional or project responsibilities that could significantly influence current or future Pratt-Whitney Rocketdyne contracts.

¹ These personnel include JSC Center Director, JSC Deputy Center Director, JSC Astronaut and Director Space Shuttle Safety and Mission Assurance Office, JSC Manager and Deputy Manager, Space Shuttle Program, Director, JSC Flight Crew Operations, Manager, International Space Station Program, JSC Manager, Advanced Planning Office, JSC Manager, Constellation Program Office, JSC Shuttle Program, Chief Engineer, JSC Associate Director, Technical.

I have determined that free attendance of these senior institutional and project leaders at the pre-launch reception is in the interests of the agency because it will further agency programs and operations. The attendance of these senior NASA employees at the event will help to raise NASA's profile with national, state, and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the modest market value of the event, I have determined that the value to the agency in having these senior institutional and project leaders attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA, JSC employees in the positions identified above may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. Free attendance by employees whose duties do not affect the industry co-sponsors is addressed in a separate determination.

Questions about this determination may be addressed to Rebecca M. Bresnik at 281-483-9463.

for 
Bernard J. Roan

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