National Aeronautics and Space Administration

George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812

August 10, 2007

Reply to Attn of: LS01

MEMORANDUM FOR RECORD

FROM: LS01/William J. Bierbower

SUBJECT: Blanket approval for MSFC Senior Institutional and/or those with Project Responsibilities to Attend an Open House/Ribbon Cutting sponsored by ATK

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

MSFC employees with senior institutional or project responsibilities have been invited to attend an open house luncheon event sponsored by ATK Huntsville Office (ATK) at ATK's new offices, Monday, August 13, 2006, from 11:00 am until 1:00 pm. The purpose of the event is to showcase ATK's new office building and location in Cummings Research Park.

This event will be a widely-attended gathering of aerospace industry representatives, academia and state and local elected officials. The reception is valued at approximately $10 per person and approximately 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).

ATK is a current MSFC contractor. Some MSFC personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to ATK's business interests. These personnel include the MSFC Center Director; Deputy Director; Associate Director; Associate Director for Technical Management; Manager, Exploration Launch Office; Deputy Manager, Exploration Launch Office; Supervisor, First Stage Office; Supervisor, Government & Community Relations Office; Manager, Science & Mission Systems Office; Supervisor, Lunar Program & Projects Office; Director, Engineering Directorate; Deputy Director, Engineering Directorate; Supervisor, Reusable Solid Rocket Booster Project; Motor Deputy, Reusable Solid Rocket Booster Project; Manager, Shuttle Propulsion Office; Director, Safety & Mission Assurance; Chief Counsel; Director, Office of Strategic Analysis & Communication; Director, Procurement Office; Director, Center Operations; and Director, Office of Human Capital.

I have determined that free attendance of these senior institutional and project leaders at this luncheon is in the interests of the agency because it will allow NASA to disseminate information about its programs to industry and government leaders. It is in NASA's interest to maintain strong ties to the community, and the presence of local leaders at this event supports the desirability of having NASA personnel present.

The total per-person cost for the event is estimated at $10. Given the purpose of the event, 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 employees in the positions identified above may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

Questions about this determination may be addressed to Pam Bourque at 256-544-0024.

William J. Bierbower
Chief Counsel