

National Aeronautics and Space Administration
George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812



Reply to Attn of:

LS01(AMM)

September 4, 2007

MEMORANDUM FOR RECORD

FROM: LS01/William J. Bierbower

SUBJECT: Approval for MSFC Employees with Senior Institutional and Senior Administrative Responsibilities to attend the 2007 Annual Outing sponsored by the Huntsville/Madison County Chamber of Commerce

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

Certain MSFC employees have been invited to attend the 2007 Annual Outing sponsored by the Huntsville/Madison County Chamber of Commerce at Ditto Landing on, September 25, 2007. The purpose of the event is to honor NASA and the Military.

This event will be a widely-attended gathering of representatives of government, aerospace industry, small businesses, and community leaders. The reception is valued at \$20 per person and approximately 300 individuals have been invited to attend. The reception is fully funded by the Huntsville/Madison County Chamber of Commerce and will include a buffet and an open bar. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

Some MSFC officials have job duties that involve frequent interaction with the Chamber of Commerce and may substantially affect the Chamber's interests or the interests of a majority of the Chamber's members. These personnel include the following: Center Director, Marshall Space Flight Center; Deputy Center Director, Marshall Space Flight Center; MSFC Associate Director; Director, Office of Strategic Analysis & Communications; Manager, Government & Community Relations. These personnel are similarly situated in that they each have institutional responsibilities for MSFC that involve significant community relations responsibilities, and that may significantly influence Chamber programs and activities.

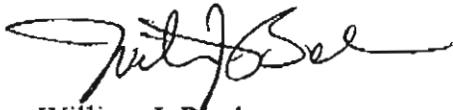
I have determined that free attendance of these senior leaders at the 2007 Annual Outing is in the interest of the agency because it will further agency programs and operations.

The attendance of these senior NASA employees at the event will help to raise NASA's profile with 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.

The total per-person cost for the event is estimated at \$20. 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 senior administrative 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. Free attendance by employees whose duties do not affect the Chamber's members is addressed in a separate determination.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.



William J. Bierbower
Chief Counsel