National Aeronautics and Space Administration
Kennedy Space Center
Kennedy Space Center, FL 32899

March 9, 2010

Reply to Attn of: CC-A

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Attendance at the FIRST Robotics Florida Regional Luncheon

The FIRST Robotics Florida Regional will sponsor the annual Florida FIRST Regional Robotics Luncheon at the University of Central Florida in Orlando on March 12, 2010. Approximately 150 guests from academia, space-related industries, community groups, the media, and state and Federal Government have been invited to attend. As part of the FIRST Robotics Florida Regional Competition, this luncheon is designed to highlight the importance of growing Florida's high tech work force. The FIRST competition has been successful in inspiring and motivating students to enter the technically advanced workplace. The cost of the event is $22 a person.

This event is a "widely attended gathering." The event will provide agency representatives the opportunity to discuss matters of interest to NASA with officials from other Federal and state agencies, members of academia, the media, community group members, and representatives of the space industry. It is in the Government's best interest for those NASA employees who are invited to this event to attend as representatives of NASA. In accordance with 5 C.F.R. § 2635.204(g)(3)(i), Widely Attended Gatherings and Other Events, I have determined NASA's ongoing interest in the space education program and in encouraging students to make science and technology a career choice outweighs the concern that free attendance at this event may, or may appear to, improperly influence NASA personnel in the performance of their official duties. Accordingly, NASA employees whose duties do not substantially affect Florida Regional may accept an invitation for free attendance at the event.

Accordingly, NASA employees whose duties do not substantially affect any of the sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under the Executive Order 13490, may accept an invitation for free attendance at the event for themselves and a guest. NASA employees whose duties may substantially affect Florida Regional, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in these events from the Chief Counsel's Office.

Jerald D. Stubbs
Agency Designee

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