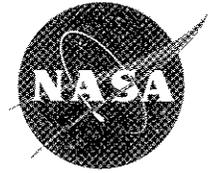


National Aeronautics and Space Administration
George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812



April 1, 2010

Reply to Attn of:

LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/William J. Bierbower

SUBJECT: Approval for MSFC Center Director and Deputy Director to Attend a Pre-launch Reception Sponsored by Jacobs Technology, Inc.

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

The MSFC Center Director and Deputy Director, who have senior institutional and project responsibilities, have been invited to attend a pre-launch reception sponsored by Jacobs Technology, Inc. (Jacobs) at the Hilton Oceanfront Hotel-Cocoa Beach, Florida, on or about April 3, 2010, from 8:00 p.m. – 10:30 p.m. This event is to be held in conjunction with the launch of STS-131 at the Kennedy Space Center.

This event will be a widely-attended gathering of aerospace industry representatives, academia, members of Congress, NASA employees, supplier network contractors, media, and members of the public. The reception is valued at \$15 per person and approximately 300 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).

Jacobs is a contractor that is currently providing engineering support services to Marshall Space Flight Center. The Marshall Center Director and Deputy Director presently, or may in the near future, have extensive involvement in matters relating to Jacobs’ business interests.

I have determined that free attendance of the Center Director and Deputy Director at the pre-launch reception is in the interests of the agency because it will further agency programs and operations. The attendance of the Center Director and Deputy Director 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 the Center Director and Deputy Director attend this event outweighs any

concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, the Center Director and Deputy Director may accept free attendance at the event. They may also accept an invitation for their spouse or guests. Free attendance by employees whose duties do not affect the industry sponsors is addressed in a separate determination.

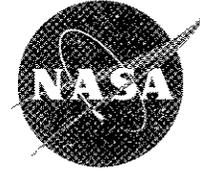
Jacobs Engineering, Inc. is a lobbying organization, and as such NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the cost of the refreshments they consume at the reception.

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

A handwritten signature in black ink, appearing to read "William J. Bierbower". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

William J. Bierbower
Chief Counsel

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



April 1, 2010

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/ William J. Bierbower

SUBJECT: Blanket Approval to Attend a Pre-launch Reception Sponsored
By Jacobs Technology, Inc.

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

NASA invitees, accompanied by their spouse or a guest, may attend a pre-launch reception Sponsored by Jacobs Technology, Inc. at the Hilton Hotel-Cocoa Beach, Florida, on or about April 3, 2010, from 8:00 p.m. – 10:30 p.m. This event is to be held in conjunction with the launch of STS-131 at the Kennedy Space Center.

This event will be a widely-attended gathering of aerospace industry representatives, academia, members of Congress, NASA employees, supplier network contractors, media, and members of the public. The reception is valued at \$15 per person and approximately 300 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).

I have determined that free attendance at the above mentioned reception is in the interest of the agency because it will further agency programs and operations. The attendance of 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 activities. Given the purpose of the event, the broad attendance anticipated, and the modest market value of this social event, I have determined that the value to the agency in having employees 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 that have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. NASA employees who feel that their duties may in some way substantially affect Jacobs Technology, Inc. are not covered in this determination and should contact Annette Metcalf Coffel, at (256) 544-0025, to seek a determination pursuant to 5 CFR § 2635.204(g)(3)(i), regarding their participation in this event.

Jacobs Engineering, Inc. is a lobbying organization, and as such NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the cost of the refreshments they consume at the reception.

A handwritten signature in black ink, appearing to read "William J. Bierbower", with a long, sweeping horizontal line extending to the right.

William J. Bierbower
Chief Counsel