National Aeronautics and Space Administration

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

July 28, 2010

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/ William J. Bierbower

SUBJECT: Approval for MSFC Employees with Senior and Leadership Responsibilities to Attend the Lockheed Martin "A Tribute to Teamwork" at the Davidson Center for Space Exploration

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

MSFC employees with senior and leadership responsibilities[1] have been invited to attend "A Tribute to Teamwork -- Government, Industry and Community: Together Delivering Results." This reception will take place Monday, August 16, 2010, at the Davidson Center for Space Exploration at the U.S. Space and Rocket Center. The event is sponsored by Lockheed Martin Corporation.

The cost per person is $32.00. There will also be a commemorative photo frame given to each guest, which has a value of $5. Total expected attendance is approximately 350 people. This event will be a widely-attended gathering of NASA, federal agencies, and Department of Defense employees; Congressional representatives and staffers; state and local officials; industry representatives and partners; other contractors; academia; and members of the public. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).[2]

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

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[1] Deputy Director of the Office of Center Operations

[2] Lockheed Martin is a lobbying organization and is registered as such under the Lobbying Disclosure Act. For NASA non-career civil servants who may attend this event, employees in positions for which the Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsor the cost of the event.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the reasonable market value of the event, I have determined that the value to the agency in having these individuals 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 Annette Metcalf Coffel at 256-544-0025.

William J. Bierbower
Chief Counsel

National Aeronautics and Space Administration

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

July 28, 2010

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/ William J. Bierbower

SUBJECT: Blanket Approval for MSFC Employees to Attend the Lockheed Martin "A Tribute to Teamwork" at the Davidson Center for Space Exploration

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

Several NASA employees have been invited to attend "A Tribute to Teamwork -- Government, Industry and Community: Together Delivering Results." This reception will take place Monday, August 16, 2010, at the Davidson Center for Space Exploration at the U.S. Space and Rocket Center. The event is sponsored by Lockheed Martin Corporation.

The cost per person is $32.00. There will also be a commemorative photo frame given to each guest, which has a value of $5. Total expected attendance is around 350 people. This event will be a widely-attended gathering of NASA, federal agencies, and Department of Defense employees; Congressional representatives and staffers; state and local officials; industry representatives and partners; other contractors; academia; and members of the public. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).[1]

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 reasonable market value of this event, I have determined that the value to the agency in having employees

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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 whose duties may substantially affect Lockheed Martin are not covered in this determination and should seek a specific determination from this office pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in this event.

Lockheed Martin is a lobbying organization and is registered as such under the Lobbying Disclosure Act. Therefore, NASA employees in non-career positions for which the Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsor the cost of the event.

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

William J. Bierbower
Chief Counsel