

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



October 20, 2010

Reply to Attn of LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/William J. Bierbower

SUBJECT: Blanket approval for NASA Employees to attend the 22<sup>nd</sup> Annual Dr. Wernher von Braun Memorial Dinner

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

A group of NASA employees have been invited to attend the 22<sup>nd</sup> Annual Dr. Wernher von Braun Memorial Dinner sponsored by The National Space Club. This event is scheduled for Wednesday, October 27, 2010, at the U.S. Space & Rocket Center Davidson Center for Space Exploration in Huntsville, Alabama. The evening begins with a reception and cash bar at 5:30 p.m. and dinner at 7:00 p.m. The Guest Speaker is Gary Payton, Undersecretary of Space Programs US Air Force.

The National Space Club (NSC) was founded on October 4, 1957, to stimulate the exchange of ideas and information about rocketry and astronautics, and to promote recognition of U.S. achievements in space. The NSC is a non-profit corporation comprised of representatives from industry, government, educational institutions, and private individuals.

This event will be a widely-attended gathering of NSC members, NASA and military members, and local elected officials, as well as other community leaders. Besides 150 Marshall Space Flight Center employees, representatives of the U.S. Army Aviation and Missile Command, the U.S. Army Space and Missile Defense Command, U.S. Army Forces Strategic Command, and the Missile Defense Agency, have been invited. It is also expected that community leaders, state and local officials, and representatives of private industry will be in attendance. The event is valued at \$75.00 per person and approximately 850 individuals have been invited to attend. I find that the event 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 event 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 military, governmental, and community 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 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 the NSC, or a majority of its members, 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.

The National Space Club is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

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

  
William J. Bierbower  
Chief Counsel  
Marshall Space Flight Center