National Aeronautics and
Space Administration
John C. Stennis Space Center
Stennis Space Center, MS 39529-6000

April 8, 2011

Reply to the Attn: Office of Chief Counsel

MEMORANDUM FOR RECORD

FROM: Amy E. Grose

SUBJECT: Blanket Approval for Stennis Space Center Senior Institutional and those with Project Responsibilities to Attend a Pre-Launch Reception Sponsored by Jacobs Technology Incorporated, FOSC Group.

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

Stennis Space Center ("SSC") employees with senior institutional or project responsibilities with regard to facility operating services have been invited to attend a pre-launch reception sponsored by Jacobs Technology Incorporated, FOSC Group ("Jacobs FOSC Group") at the Doubletree Hotel, Cocoa Beach, Florida, on Thursday, April 28, 2011, from 6:00-8:00 p.m. This event is to be held in conjunction with the launch of STS-134 at the Kennedy Space Center.

This event will be a widely-attended gathering of aerospace industry representatives, and Federal and State elected officials. The refreshments which will be provided by Jacobs FOSC Group are valued at approximately $10 per person. Approximately 150 individuals have been invited to attend the reception. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

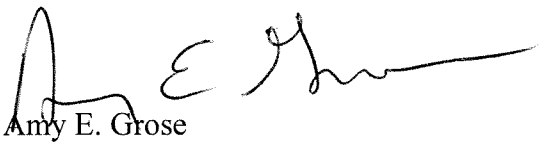
Jacobs FOSC Group is a contractor company that is currently involved in facility operating services for SSC and its tenant organizations. Some SSC personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to Jacobs FOSC Group business interests. The invited personnel include the following: SSC Center Director; SSC Deputy Director; SSC Associate Director; and, Director, Engineering and Science Directorate. These employees are similarly situated in that they each have senior institutional or project responsibilities that could significantly influence current or future Jacobs FOSC Group contracts.

I have determined that free attendance of these senior institutional and project leaders at the launch reception is in the interests of the agency because it will further agency programs and operations. See, 5 CFR 2635.204(g)(3)(i). The attendance of these senior NASA employees 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 concerning its activities.

The total per-person cost for the event is estimated at $10. Given the purpose of the event, the alignment of the launch reception's interests with NASA's, the broad attendance anticipated, and the modest market value of this social event, I have determined that the value to the agency in having these senior institutional and project 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 substantially affect the sponsor is addressed in a separate determination.

Questions about this determination may be addressed to the undersigned at 228-688-1588.



Amy E. Grose
Chief Counsel