

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



June 30, 2011

Reply to the Attn: Office of Chief Counsel

MEMORANDUM FOR RECORD

FROM: Chief Counsel

SUBJECT: Blanket Approval to Attend a Pre-Launch Reception Sponsored by ASRC Research & Technology Solutions LLC (ARTS); A2Research; Patriot Technologies, LLC; Pratt & Whitney Rocketdyne (a subsidiary of United Technology Corporation); Lockheed Martin; Jacobs Sverdrup Technologies (a subsidiary of Jacobs Engineering Group)

In accordance with 5 C.F.R. 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 ASRC Research & Technology Solutions LLC (ARTS); A2Research; Patriot Technologies, LLC; Pratt & Whitney Rocketdyne; Lockheed Martin; and Jacobs at the Doubletree Hotel, Cocoa Beach, Florida, on Wednesday, July 6, 2011, from 6:00-8:00 p.m. This event is to be held in conjunction with the launch of STS-135 at the Kennedy Space Center.

This event will be a widely-attended gathering of approximately 300 representatives of government, the aerospace industry and the community. The reception will permit NASA employees to discuss and celebrate with other attendees their collaborative efforts in assuring the execution of continued safe space exploration. Hot hors d'oeuvres, which will be provided by the aforementioned companies, are valued at approximately \$17 per person.

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 national, state, and local business and governmental leaders, will contribute to community relations, and will support NASA's objectives. 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 whose duties may substantially affect ARTS, A2Research, Patriot, Pratt & Whitney Rocketdyne, Lockheed Martin, and Jacobs are not covered in this determination and

should seek a determination pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in these events from their local ethics counselor.

United Technology Corporation (parent of Pratt & Whitney Rocketdyne), Lockheed Martin Corporation, and Jacobs Technology Incorporated are each registered as lobbying organizations, 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 regarding this determination may be addressed to the undersigned at 228-688-2164.



Amy E. Grose
Chief Counsel