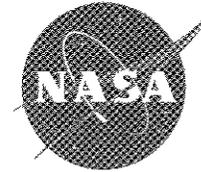


National Aeronautics and Space Administration
George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812



December 5, 2011

Reply to Attn of:

LS01 (KLM)

MEMORANDUM FOR RECORD

FROM: LS01/James R. Frees

SUBJECT: Approval for NASA Employees with Senior Institutional to attend the Redstone Update and Hail to AMC Luncheon sponsored by the Huntsville/Madison County Chamber of Commerce

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

Certain NASA employees with senior institutional responsibilities have been invited to attend the Redstone Update and Hail to AMC Luncheon sponsored by the Huntsville/Madison County Chamber of Commerce (Chamber) at the VBC South Hall Ball Rooms on December 12, 2011 (12-1:15 PM). The purpose of the event is to give Chamber members an opportunity to better understand the roles and missions of the various activities located on post at Redstone Arsenal (including NASA's Marshall Space Flight Center), as well as some perspective on the direction these commands and activities are headed.

This event will be a widely-attended gathering of representatives of Redstone Arsenal, NASA's Marshall Space Flight Center, Chamber membership, private industry, local elected officials, and representatives from federal agencies. A luncheon will be provided at a cost of approximately \$50 per person. Approximately 800 people from the community are expected to attend. The luncheon is fully funded by the Chamber of Commerce. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

The Chamber of Commerce is the lead economic development organization for Huntsville/Madison County, providing assistance for business expansion and recruitment, and delivering information regarding available sites, labor force, workforce development, taxation, finance programs and incentives. Members of the Chamber of Commerce include many NASA contractors and suppliers.

Attendance of NASA employees with senior institutional responsibilities at this event would be in the best interest of NASA, since it will further NASA programs and operations. NASA personnel invited to attend this event have, or may soon have, duties that involve frequent

interaction with the Chamber of Commerce and may substantially affect the Chamber's interests or the interest of a majority of the Chamber's members.¹

These personnel are similarly situated in that they each have senior institutional responsibilities for NASA that may involve significant community relations responsibilities that could significantly influence Chamber programs and activities.

I have determined that attendance of these senior institutional leaders at the Redstone Update and Hail to AMC Luncheon is in the interest of NASA because it will further agency programs and operations, help to raise NASA's profile with state and local business and governmental leaders, enhance community relations, and 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 reasonable market value of the event, I have determined that the value to the agency in having these senior institutional 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.

The Huntsville/Madison County Chamber of Commerce is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

Questions about this determination may be addressed to Kristine Mackey at 256-544-5014.


James R. Frees
Acting Chief Counsel

¹ Based on the invitation list provided, those personnel, identified by position, are: Deputy Center Director, Director of the Office of Strategic Analysis and Communications, Manager of the External Relations Office, and the Deputy Director of Center Operations.