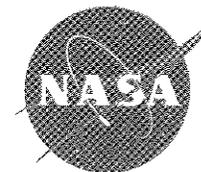


National Aeronautics and Space Administration
George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812



January 24, 2012

Reply to Attn of:

LS01 (PAW)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Blanket Approval to Attend Reception and Premiere of Hallmark Hall of Fame Movie "A Smile as Big as the Moon" Sponsored By the State of Alabama Department of Tourism

In accordance with 5 CFR § 2635.204(g)(2) and (3) and 14 C.F.R. 1207.103(c)(4), I make the following determination:

NASA invitees, accompanied by their spouse or a guest, may attend a reception and movie showing sponsored by the State of Alabama Department of Tourism at the U.S. Space & Rocket Center, Davidson Center Digital Theater, One Tranquility Base, Huntsville, Alabama, on January 27, 2012. The reception begins at 5:30 p.m. and the movie showing is at 6:15 p.m. This event premieres the Hallmark Hall of Fame movie on Space Camp entitled "A Smile as Big as the Moon."

This event will be a widely-attended gathering of members of the Alabama Congressional Delegation and members of their staff, Governor of Alabama Robert Bentley, the Director of the Alabama Tourism Department, NASA employees, local elected officials and members of the public. The reception and movie showing is valued at \$50.00 per person. Approximately 350 individuals have been invited to attend. I find that the reception 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 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 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 and may also accept invitations for accompanying spouses or

guests. Gifts of a copy of the book A Smile as Big as the Moon (\$19.95 value), a DVD of the movie (\$19.95 value), and a movie poster (de minimis value) are to be provided to all attendees. NASA employees and/or their accompanying spouses or guests may accept unsolicited gifts having an aggregate market value of \$20 or less per source per occasion. See 5 C.F.R. § 2635.204(a). Accordingly, the NASA employee or his/her guest may accept the book or the DVD, but not both, since the aggregate value of these two tangible items exceeds \$20.00. Alternatively, the NASA employee or his/her guest may accept both the DVD and the book if s/he pays the full \$39.90 value of these items.

NASA employees whose duties may substantially affect the State of Alabama Department of Tourism 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 State of Alabama Department of Tourism is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

Questions about this determination may be addressed to Patricia A. Watson at 256-544-0056.


Audrey D. Robinson
Chief Counsel