



March 15, 2011

Reply to Attn of:

LS01 (KLM)

MEMORANDUM FOR RECORD

FROM: LS01/James J. McGroary

SUBJECT: Approval for NASA Officials with Senior Institutional Responsibilities to Attend the Washington Update Breakfast with Senator Richard Shelby

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

The Huntsville Madison County Chamber of Commerce (Chamber of Commerce) issued four invitations to the NASA Marshall Space Flight Center (MSFC) for attendance at the Washington Update Breakfast at the Von Braun Center North Hall. The Chamber of Commerce issued these invitations for MSFC's Associate Center Director of Management, Associate Center Director of Technical, and two representatives from the Public Affairs Office. This event will take place on March 19, 2011, and is sponsored by the Chamber of Commerce. There will be a breakfast reception with Senator Richard Shelby. This event is held to update community leaders, military leaders, and NASA leaders on what is happening in Washington, DC.

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.

The breakfast will be a widely-attended gathering of community leaders, aerospace and defense industry representatives, local elected officials, and military and NASA leaders. A breakfast valued at \$30 per person will be served and approximately 800 individuals have been invited to attend. The reception 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).

Attendance of the NASA employees invited to this event would be in the best interest of NASA, since it will further NASA programs and operations. NASA attendees at this event may have, or soon may 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.

The NASA employees invited to attend this event have institutional responsibilities for MSFC that involve significant community relations responsibilities that could significantly influence Chamber programs and activities.

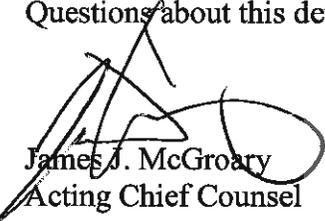
I have determined that attendance of MSFC's Associate Center Director of Management, Associate Center Director of Technical, and two representatives from the Public Affairs Office at the Washington Update breakfast reception is in the interest of NASA because it will further agency programs and operations, 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 the previously mentioned NASA 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, MSFC's Associate Center Director of Management, Associate Center Director of Technical, and two representatives from the Public Affairs Office 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 J. McGroary
Acting Chief Counsel