



Reply to Attn of:LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for Certain NASA Employees with Senior Institutional and External Relations Responsibilities to attend the "NASA Day in Montgomery" Luncheon Sponsored by the Huntsville/Madison County Chamber of Commerce, Alabama Coalition for Space Exploration, and Several Aerospace Companies

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

Certain NASA employees with senior institutional and external relations responsibilities have been invited to attend the "NASA Day in Montgomery" Luncheon sponsored by the Huntsville/Madison County Chamber of Commerce (Chamber), Alabama Coalition for Space Exploration (Coalition),<sup>1</sup> and several aerospace companies, Sci-Quest, and UA Huntsville.<sup>2</sup> The luncheon will take place at the Retirement Systems of Alabama (RSA) Plaza Terrace on May 3, 2012.

Marshall Acting Center Director Gene Goldman will be present that morning to visit with members of the legislature, then he will address the State Legislature, and there will be NASA exhibits for viewing at the State Capitol. The luncheon will be a widely-attended gathering including Governor Bentley, his cabinet and staff members; state legislators and their staff; approximately fifty members of the Alabama Coalition for Space Exploration; members of the Huntsville/Madison County Chamber of Commerce; and several NASA employees. The luncheon will cost approximately \$20 per person and 250 people are expected to attend. The luncheon will be paid for by the Chamber, Coalition, and several aerospace companies. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

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<sup>1</sup> The following companies are corporate sponsors of the Coalition for Space Exploration: Aerojet, ATK, Ball Aerospace, Boeing, Harris, Lockheed Martin, and Northrop Grumman.

<sup>2</sup>The following companies and organizations are sponsoring the luncheon: Aerojet, Boeing, Chamber, Coalition, Dynetics, Lockheed Martin, Pratt & Whitney, Teledyne Brown Engineering, United Launch Alliance, Sci-Quest Hands on Science Museum, and UA Huntsville.

The NASA personnel invited to attend this event are similarly situated in that they each have senior institutional or external relations responsibilities that may involve significant community relations responsibilities, that involve frequent interaction with the Chamber, Coalition, and these aerospace companies, and may substantially affect the business interests of the Chamber, Coalition, or the aerospace companies listed above.<sup>3</sup>

I have determined that attendance of these senior institutional and external relations employees at the luncheon is in the interest of NASA because it will further agency programs and operations, help to raise NASA's profile with state 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 modest market value of the event, I have determined that the value to the agency in having these senior institutional and external relations 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 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.

The following companies are lobbying organizations and are registered as such under the Lobbying Disclosure Act: Aerojet, Ball Aerospace, Boeing, Lockheed Martin, Northrop Grumman, Teledyne Brown Engineering, and United Launch Alliance. As such, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490, may only attend this event if they make arrangements to reimburse the sponsors for the cost of the food consumed.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.



Audrey D. Robinson  
Chief Counsel

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<sup>3</sup> Based on the invitation list provided, those personnel, identified by position, are MSFC Acting Center Director; Director, Office of Strategic Analysis & Communications; and Supervisor, External Relations Office.

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



May 2, 2012

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Blanket Approval for NASA Employees to attend the "NASA Day in Montgomery" Luncheon Sponsored by the Huntsville/Madison County Chamber of Commerce, Alabama Coalition for Space Exploration, and Several Aerospace Companies

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

Several NASA employees have been invited to attend the "NASA Day in Montgomery" Luncheon sponsored by the Huntsville/Madison County Chamber of Commerce (Chamber), Alabama Coalition for Space Exploration (Coalition),<sup>1</sup> and several aerospace companies, Sci-Quest, and UA Huntsville.<sup>2</sup> The luncheon will take place at the Retirement Systems of Alabama (RSA) Plaza Terrace on May 3, 2012.

Marshall Acting Center Director Gene Goldman will be present that morning to visit with members of the legislature, then he will address the State Legislature, and there will be NASA exhibits for viewing at the State Capitol. The luncheon will be a widely-attended gathering including Governor Bentley, his cabinet and staff members; state legislators and their staff; approximately fifty members of the Alabama Coalition for Space Exploration; members of the Huntsville/Madison County Chamber of Commerce; and several NASA employees. The luncheon will cost approximately \$20 per person and 250 people are expected to attend. The luncheon will be paid for by the Chamber, Coalition, and several aerospace companies. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

I have determined that attendance of these NASA employees at the luncheon is in the interest of NASA because it will further agency programs and operations, help to raise NASA's profile with

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<sup>1</sup> The following companies are corporate sponsors of the Coalition for Space Exploration: Aerojet, ATK, Ball Aerospace, Boeing, Harris, Lockheed Martin, and Northrop Grumman.

<sup>2</sup> The following companies and organizations are sponsoring the luncheon: Aerojet, Boeing, Chamber, Coalition, Dynetics, Lockheed Martin, Pratt & Whitney, Teledyne Brown Engineering, United Launch Alliance, Sci-Quest Hands on Science Museum, and UA Huntsville.

state business and governmental leaders, enhance community relations, and support NASA's statutory mandate to disseminate information about its programs.

Accordingly, NASA employees that have been invited to attend may accept free attendance at the event. NASA employees whose duties may substantially affect the Chamber, Coalition, or the companies listed above, 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 Huntsville/Madison County Chamber of Commerce is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

The following companies are lobbying organizations and are registered as such under the Lobbying Disclosure Act: Aerojet, Ball Aerospace, Boeing, Lockheed Martin, Northrop Grumman, Teledyne Brown Engineering, and United Launch Alliance. As such, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490, may only attend this event if they make arrangements to reimburse the sponsors for the cost of the food consumed.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.

A handwritten signature in black ink, appearing to read "Audrey D. Robinson", with a long horizontal flourish extending to the right.

Audrey D. Robinson  
Chief Counsel