National Aeronautics and Space Administration

George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812

October 12, 2012

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Employees with Senior Institutional or Project Responsibilities to attend the 24th Annual Dr. Wernher von Braun Memorial Dinner

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

Certain NASA employees with senior institutional or project responsibilities have been invited to attend the 24th Annual Dr. Wernher von Braun Memorial Dinner sponsored by The National Space Club, scheduled for Wednesday, October 17, 2012, at the U.S. Space & Rocket Center Davidson Center for Space Exploration. The evening begins with a reception and cash bar at 5:30 p.m., and dinner at 7:00 p.m. The Guest Speaker is Paul Allen, co-founder of Microsoft Corp.

The National Space Club (NSC) was founded on October 4, 1957, to stimulate the exchange of ideas and information about rocketry and astronautics, and to promote recognition of U.S. achievements in space. The NSC is a non-profit corporation comprised of representatives from industry, government, educational institutions, and private individuals.

This event will be a widely-attended gathering of NSC members, NASA and military members, and local elected officials, as well as other community leaders. Besides more than 130 NASA employees, representatives of the U.S. Army Aviation and Missile Command, the U.S. Army Space and Missile Defense Command, U.S. Armed Forces Strategic Command, and the Missile Defense Agency, have been invited. It is also expected that community leaders, state and local officials, and representatives of private industry will be in attendance. The event is valued at $150.00 per person and approximately 900 people are expected to attend. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

Most of NSC's members are companies that are currently providing contractual services to NASA, or will seek to provide contractual services to NASA in the future.[1] Some NASA personnel invited to attend this event presently, or may in the near future, have extensive

[1] See file for listing of NSC corporate membership.

involvement in matters relating to members of NSC in their pursuit to provide, or seek to provide, contractual services to NASA.[2] These personnel are similarly situated in that they each have Senior Institutional or Project responsibilities that could significantly influence current or future contracts for a majority of the NSC's corporate members. Alternatively, they may have duties that could significantly affect the interests of the NSC itself.

I have determined that free attendance of these senior institutional leaders at the event is in the interests of the agency because it will further agency programs and operations. The attendance of these senior 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 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. They may also accept invitations for accompanying spouses or guests.

The National Space Club is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

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

Audrey D. Robinson
Chief Counsel

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[2] Center Director; Associate Directors; Manager and Deputy Manager, SLS Program Office; Program Support and Operations Office Supervisor; Boosters Office Supervisor; Engines Office Supervisor; Program Planning and Control Supervisor; Program Integration Office Supervisor; Stages Office Supervisor; Spacecraft and Payload Integration Office Supervisor; Ground Operations Liaison Office Supervisor; Advanced Development Office Supervisor; Flight Programs and Partnerships Manager and Deputy Manager; Science and Technology Office Manager and Deputy Manager; Chief Engineer; Supervisory Contract Specialist; Industry Relations Specialist; and Lead Public Affairs Specialist; Director, Office of Procurement; Supervisor, External Relations Office; Lead, Protocol and Events Office; Chief Counsel; Chief Financial Officer; Director, Office of Strategic Analysis & Communications; and Lead Public Affairs Specialist.

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George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812

October 12, 2012

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Blanket approval for NASA Employees to attend the 24th Annual Dr. Wernher von Braun Memorial Dinner

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 24th Annual Dr. Wernher von Braun Memorial Dinner sponsored by The National Space Club. This event is scheduled for Wednesday, October 17, 2012, at the U.S. Space & Rocket Center Davidson Center for Space Exploration. The evening begins with a reception and cash bar at 5:30 p.m., and dinner at 7:00 p.m. The Guest Speaker is Paul Allen, co-founder of Microsoft Corp.

The National Space Club (NSC) was founded on October 4, 1957, to stimulate the exchange of ideas and information about rocketry and astronautics, and to promote recognition of U.S. achievements in space. The NSC is a non-profit corporation comprised of representatives from industry, government, educational institutions, and private individuals.

This event will be a widely-attended gathering of NSC members, NASA and military members, and state and local elected officials, as well as other community leaders. Besides more than 130 NASA employees, representatives of the U.S. Army Aviation and Missile Command, the U.S. Army Space and Missile Defense Command, U.S. Armed Forces Strategic Command, and the Missile Defense Agency, have been invited. It is also expected that community leaders, state and local elected officials, and representatives of private industry will be in attendance. The event is valued at $150.00 per person and approximately 900 people are expected to attend. 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 free attendance at the above mentioned event 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 elected officials, military, governmental, and community 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 reasonable market value of this

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 the NSC, or a majority of its members, 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 National Space Club is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

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

Audrey D. Robinson
Chief Counsel