



October 23, 2012

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Senior Leadership and External Relations Employees to attend the Washington Update Luncheon

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

Certain NASA Senior Leadership and External Relations employees have been invited to attend the Washington Update Luncheon at the Von Braun Center North Hall. This event will take place on October 24, 2012, and is sponsored by the Huntsville/Madison County Chamber of Commerce (Chamber). There will be a luncheon at noon. This event is held to update community leaders, military leaders, and NASA leaders on issues that Senator Sessions considers important to the community.

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 luncheon will be a widely-attended gathering of community leaders, aerospace and defense industry representatives, local elected officials, and military and NASA leaders. A luncheon valued at \$30 per person will be served and approximately 1000 individuals have been invited to attend. The reception is fully funded by the Chamber. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

Attendance of certain NASA Senior Leadership and External Relations employees¹ at this event would be in the best interest of NASA, since it will further NASA programs and operations. These employees 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.

¹ Associate Director for Management; Associate Director for Technical; Manager of External Relations.

These Senior employees may have external relations responsibilities for MSFC that involve significant community relations responsibilities that could significantly influence Chamber programs and activities.

I have determined that attendance of these Senior Leadership and External Relations employees at the Washington Update 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 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, these Senior employees 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 Annette Metcalf Coffel at 256-544-0025.



Audrey D. Robinson
Chief Counsel