MEMORANDUM FOR RECORD

FROM:   LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Officials with Senior Program Responsibilities to
         Attend the Aerospace Alliance 2012 Fall Summit in New Orleans

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

The Aerospace Alliance (AA) issued four invitations to the NASA Marshall Space Flight
Center (MSFC) and Michoud Assembly Facility (MAF) for attendance at the Aerospace
Alliance 2012 Fall Summit in New Orleans. The AA issued these invitations for MSFC’s
SLS Program Manager, and MAF’s Director, Deputy Director, and Deputy Chief
Operating Officer. This event will take place on October 25, 2012, and is sponsored by
the Alabama Development Office, Enterprise Florida, Louisiana Economic Development,
and the Mississippi Development Authority. This event is held to include state and local
officials, academia, industry representatives, NASA personnel, and media in supporting
the mission of the AA in establishing the Gulf Coast and surrounding region as a world-
class aerospace, space, and aviation corridor.

The AA is a 501(c)(6) private/public organization comprised of state government and
corporate members interested in advancing the aerospace and aviation corridor in the
Southeastern region of the United States. State members of the AA includes Alabama,
Louisiana, Mississippi, and Florida.

The dinner will be a widely-attended gathering of community leaders, local elected
officials, industry representatives, NASA leaders, and media. A dinner valued at $70 per
person will be served and approximately 176 individuals have been invited to attend. 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. The listed NASA invitees at
this event may have, or soon may have, program duties that involve frequent interaction
with the AA or its members and may substantially affect the AA’s interests or the interest
of a majority of the AA’s members.
I have determined that attendance of MSFC’s SLS Program Manager, and MAF’s Director, Deputy Director, and Deputy Chief Operating Officer at the Aerospace Alliance 2012 Fall Summit in New Orleans is in the interest of NASA because it will further agency programs and operations, help to raise NASA’s profile with Louisiana, Mississippi, Alabama, and Florida and New Orleans 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 SLS Program Manager, and MAF’s Director, Deputy Director, and Deputy Chief Operating Officer may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

Neither the Aerospace Alliance, Alabama Development Office, Enterprise Florida, Louisiana Economic Development, nor the Mississippi Development Authority are lobbying organizations and are not registered as such under the Lobbying Disclosure Act.

Questions about this determination may be addressed to Kristine Mackey at 256-544-0011.

Audrey D. Robinson
Chief Counsel