

National Aeronautics and Space Administration
George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812 June 19, 2013



LS01

Reply to Attn of:

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Senior Institutional and Program Officials to Attend a Reception Celebrating the Opening of the Vertical Weld Center

In accordance with 5 CFR § 2635.204(g)(2) and (3), I make the following determination:

Certain NASA officials, who have senior institutional and program responsibilities, have been invited to attend a reception sponsored by Boeing at The Court of Two Sisters in New Orleans, Louisiana, on June 21, 2013, at 5:30 p.m.¹ This event is to be held in celebration of the successful completion of a major milestone of the Space Launch System Program at the Michoud Assembly Facility (MAF) in New Orleans taking place earlier that day.

This event will be a widely-attended gathering of aerospace industry representatives, academia, members of Congress, State of Louisiana Government officials, City of New Orleans and Parish Government officials, and NASA employees. The reception is valued at \$85 per person and approximately 90 individuals are expected to attend. The event is fully funded by Boeing. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g)(2).

Boeing has several NASA contracts, including the Space Launch System (SLS) work. The NASA program officials listed presently have extensive involvement in matters relating to Boeing's business interests. These personnel are similarly situated in that they each have program responsibilities for NASA that involve Boeing.

I have determined that free attendance of these individuals at the reception is in the interest of the agency because it will further agency programs and operations. Their

¹ Center Director; Associate Center Director, Technical; Director and Deputy Director, Michoud Assembly Facility(MAF); Deputy Chief Operating Officer, MAF; Manager, Space Launch Systems (SLS) Program; Chief Engineer and Deputy Chief Engineer for SLS Program; Deputy Manager, Flight Programs and Partnerships; Manager, SLS Stages Office; Stages Chief Engineer; Stages Element Core Stage Lead; Stages Manufacturing & Assembly Lead; Stages Element Contracting Officer; Director and Deputy Director, Office of Center Operations; Director, Office of Procurement; and Director and Deputy Director, Office of Strategic Analysis and Communications (OSAC).

attendance at this event will help to raise NASA's profile with national, 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 officials attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, the listed employees may accept free attendance at the event. Free attendance by employees whose duties do not affect the sponsor is addressed in a separate determination.

Additionally, Boeing is a lobbying organization, and as such NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the \$85 cost of the reception.

If you have questions about this determination please call the Office of Chief Counsel at 256-544-0010.



Audrey D. Robinson
Chief Counsel

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

June 19, 2013



Reply to Attn of:

LS01

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Employees to Attend A Reception Celebrating the Opening of the Vertical Weld Center

In accordance with 5 CFR § 2635.204(g)(2) and (3), I make the following determination:

Several NASA employees have been invited to attend a reception sponsored by Boeing at The Court of Two Sisters in New Orleans, Louisiana, on June 21, 2013, at 5:30 p.m. This event is to be held in celebration of a major milestone of the Space Launch System Program at the Michoud Assembly Facility (MAF) in New Orleans, taking place earlier that day.

This event will be a widely-attended gathering of aerospace industry representatives, academia, members of Congress, State of Louisiana Government officials, City of New Orleans and Parish Government officials, and NASA employees. The reception is valued at \$85 per person and approximately 90 individuals are expected to attend. The event is fully funded by Boeing. I find that the reception 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 reception is in the interest of the agency because it will further agency programs and operations. The attendance of NASA employees at this event will help to raise NASA's profile with national, 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 officials 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 may accept free attendance at the event. NASA employees who work on the Space Launch System Program and whose duties may

substantially affect Boeing are not covered in this determination and should contact Pamela A. Bourque, at (256) 544-0024, to seek a determination pursuant to 5 CFR § 2635.204(g)(3)(i), regarding their participation in this event.

Boeing is a lobbying organization, and as such NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the \$85 cost of the reception.

Questions about this determination may be addressed to Pamela A. Bourque at 256-544-0024.



Audrey D. Robinson
Chief Counsel