



Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey Robinson

SUBJECT: Approval For Senior NASA Officials From Marshall Space Flight Center, Space Launch System Program, and Stennis Space Center to Attend the Aerojet Rocketdyne RS-25 Post-Test Reception

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

Certain NASA officials from Marshall Space Flight Center, Space Launch System (SLS) Program, and Stennis Space Center, who have senior institutional and SLS program or procurement responsibilities have been invited to attend the Aerojet Rocketdyne Post-Test RS-25 Reception on Thursday, August 18, 2016, at 5:30 p.m. at the INFINITY Science Center at Stennis Space Center.<sup>1</sup> This event is to be held in celebration of a successful RS-25 engine test and future steps with the Space Launch System.

Aerojet Rocketdyne is an aerospace and defense contractor which currently has several contracts with various NASA centers. Aerojet Rocketdyne's current contract responsibilities include Space Launch System (SLS) work providing the liquid engines that will power the vehicle during ascent and into deep space. These engines are the RS-25 and RL-10 engines.

This event will be a widely-attended gathering of federal, state, and local elected officials, NASA and other government agency personnel, aerospace industry representatives, and Aerojet Rocketdyne employees. Refreshments for the event are valued at \$30.00 per person and approximately 200 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).

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<sup>1</sup> The following Marshall Space Flight Center employees: Center Director; Director of The Office of Strategic Analysis and Communications (OSAC); Deputy Manager, Strategic Communications, Space Launch System Support Services Specialist, SLS Strategic Communications Manager; Space Launch System Program; Program Manager; Deputy Manager, SLS Core Stage Manager; Liquid Engines Manager.

The following Stennis Space Center employees: Center Director, Deputy Director; Associate Director; Director of Center Operations; Director of Safety and Mission Assurance; Director Office of Procurement; Director and Deputy Director of Engineering and Test Directorate; Manager, Rocket Propulsion Test Program Office; Legislative Affairs; Supervisory Public Affairs Specialist; Lead Public Affairs Specialist.

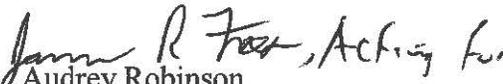
The invited NASA employees include MSFC and Stennis Center Directors and other senior institutional and program officials of MSFC and SSC. The NASA senior institutional and program officials listed currently have extensive involvement in matters involving Aerojet Rocketdyne's business interests. These employees are similarly situated in that they each have institutional and/or program responsibilities for NASA that involve Aerojet Rocketdyne. I have determined that attendance of these senior employees and program officials at the reception 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 government 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 employees who have senior, SLS, and external relations responsibilities attend this event outweighs any concern that the free attendance may or may appear to improperly influence them in the performance of their duties. Attendance of NASA employees with senior program and institutional responsibilities at this event would be in the best interest of NASA, since it will further NASA programs and operations.

Accordingly, NASA employees in the positions identified may accept free attendance for themselves and their spouse or guest. Free attendance by employees whose duties do not affect the sponsor is addressed in a separate determination.

Aerojet Rocketdyne is a lobbying organization and is registered as such under the Lobbying Disclosure Act. 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 \$30 cost of the reception for themselves and their spouse or guest.

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

  
Audrey Robinson  
Chief Counsel

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



August 17, 2016

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SUBJECT: Approval for NASA Officials From Marshall Space Flight Center  
and Stennis Space Center to Attend the Aerojet Rocketdyne  
RS-25 Post-Test Reception

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 Aerojet Rocketdyne Post-Test RS-25 Reception on Thursday, August 18, 2016, at 5:30 p.m. at the INFINITY Science Center at Stennis Space Center. This event is to be held in celebration of a successful RS-25 engine test and future steps with the Space Launch Systems (SLS).

This event will be a widely-attended gathering of federal, state, and local elected officials, NASA and other government agency personnel, aerospace industry representatives, and Aerospace Rocketdyne employees. The event is valued at \$30.00 per person and approximately 200 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).

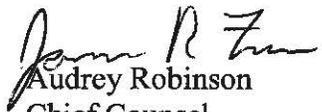
I have determined that free attendance at the above mentioned event is in the interest of the agency because it will further agency programs and operations. The attendance of NASA employees at the event will help to raise NASA's profile with state and local business and governmental leaders, will contribute 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 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, 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 Aerojet Rocketdyne 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.

Aerojet Rocketdyne is a lobbying organization and is registered as such under the Lobbying Disclosure Act. 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 \$30 cost of the reception for themselves and their spouse or guest.

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

 , Acting for  
Audrey Robinson  
Chief Counsel