

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



March 9, 2016

Reply to Attn of: LS01 (LLD)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Employees with Senior Institutional and External Relations Responsibilities to Attend the Aerospace States Association – Join Us on the Journey Breakfast

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

NASA employees with senior institutional and external relations responsibilities have been invited to attend “Join Us on the Journey Breakfast” held on March 10, 2016, at the Retirement Systems of Alabama in Montgomery, AL.

The event is sponsored by the Aerospace States Association (ASA) including several of its members: ATK Aerojet, ASRC Federal, Boeing, Lockheed Martin, SpaceX, United Launch Alliance, Alabama Power, and Aerospace Industries Association.

The ASA is a nonprofit 501(c)(3). ASA fosters and promotes aerospace and STEM activities in the States. It is a scientific and educational organization of Lieutenant Governors, Governor-appointed delegates, and associate members from industry and academia. ASA members help shape national policy and network with aerospace leaders in government and industry. Its members include numerous NASA contractors, including these sponsors ATK Aerojet, ASRC Federal, Boeing, Lockheed Martin, SpaceX, and United Launch Alliance.

This event will be a widely-attended gathering of NASA personnel; aerospace and defense industry representatives and federal, state and local government officials. The breakfast costs \$16 per person and approximately 200 individuals have been invited to attend. The breakfast is funded by the ASA, ATK Aerojet, ASRC Federal, Boeing, Lockheed Martin, SpaceX, United Launch Alliance, Alabama Power, and Aerospace Industries Association.

I find that the event meets the requirements of a “widely attended gathering” as defined in 5 CFR §2635.204(g)(2).

The invited MSFC employees are the Center Director, Director of the Office of Strategic Analysis and Communications (OSAC), Marshall Legislative Director, a NASA astronaut, Liquid Propulsion Systems Engineer, Program Support Specialist for OSAC, Exhibits Specialist,

and Public Affairs Specialist. These employees are similarly situated in that they each have senior institutional and external relations responsibilities for NASA that may involve significant community relations responsibilities that could influence ASA, ATK Aerojet, ASRC Federal, Boeing, Lockheed Martin, SpaceX, and United Launch Alliance programs and activities. Some of these individuals may have duties affecting members of ASA, ATK Aerojet, ASRC Federal, Boeing, Lockheed Martin, SpaceX, and United Launch Alliance.

I have determined that attendance of these senior institutional and external relations employees at the breakfast 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 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 identified NASA employees may accept free attendance at the event.

The ASA is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act. However, the following companies which are also sponsors of the breakfast are lobbying organizations 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 sponsors to reimburse the \$16 cost of the breakfast: Aerospace Industries Association, ATK Aerojet, Boeing, Lockheed Martin, and United Launch Alliance.

Questions about this determination may be addressed to Laura Donegan at 256-544-0012.

A handwritten signature in black ink, appearing to read "Audrey D. Robinson", with a long horizontal flourish extending to the right.

Audrey D. Robinson
Chief Counsel