

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



August 25, 2015

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Employees with Senior Institutional or External Relations Responsibilities to attend the 2015 Annual Outing Sponsored By the Huntsville/Madison County Chamber of Commerce

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

Certain NASA employees with senior institutional or external relations responsibilities have been invited to attend the 2015 Annual Outing sponsored by the Huntsville/Madison County Chamber of Commerce (Chamber) at Ditto Landing on September 22, 2015<sup>1</sup>. The purpose of the event is to celebrate the Space and Defense industry relationships with the community and the positive effect it has on the Huntsville and Madison Area.

This event will be a widely-attended gathering of representatives of Redstone Arsenal, NASA's Marshall Space Flight Center, other government representatives, aerospace industry members, small businesses, local elected officials, and the community. A buffet dinner with cocktails will be served at a cost of approximately \$25 per person. Approximately 300 people from the community are expected to attend. The reception is fully funded by the Chamber of Commerce. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

---

<sup>1</sup> Based on the invitation list provided, those personnel, identified by position, are: Director; Deputy Director; Associate Director, Technical; Associate Director, Management; Director and Deputy Director, Office of Center Operations; Chief and Deputy of the Office of Chief Financial Officer; Director and Deputy Director, Office of Chief Information Officer; Director and Deputy Director of Procurement; Manager of Procurement for SLS; Small Business Specialist, Office of Procurement; Director and Deputy Director of Engineering Directorate; Chief Engineer; Manager and Deputy Manager of Science and Mission Systems Office; Director and Deputy Director of Safety and Mission Assurance Office; Director and Deputy Director of Michoud Assembly Facility; Director and Associate Directors of the Engineering Directorate; Director and Deputy Director of the Office of Strategic Analysis & Communications, Government & Community Relations: External Relations Manager; Team Lead; Community Relations Specialist; External Relations Specialist; and Protocol Specialists.

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.

Attendance of NASA employees with senior institutional or external relations responsibilities at this event would be in the best interest of NASA, since it will further NASA programs and operations. NASA personnel invited to attend this event have, or may soon 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.

These personnel are similarly situated in that they each have senior institutional or external relations responsibilities for NASA that may involve significant community relations responsibilities that could significantly influence Chamber programs and activities.

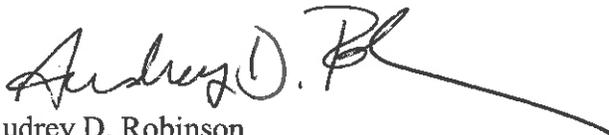
I have determined that attendance of these senior institutional and external relations leaders at the 2015 Annual Outing is in the interest of NASA because it will further agency programs and operations, help to raise NASA's profile with state and local business and governmental leaders, enhance community 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 cost of the event, I have determined that the value to the agency in having these senior institutional and external relations leaders 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 in the positions identified may accept free attendance at the event. (Spouses and guests are not covered by the offer of free attendance, and must make arrangements to pay to attend the event.) Free attendance by employees whose duties do not affect the Chamber's members is addressed in a separate determination.

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

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



August 25, 2015

Reply to Attn of:

LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval For NASA Employees To Attend the 2015 Annual Outing  
Sponsored By the Huntsville/Madison County Chamber of Commerce

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 2015 Annual Outing sponsored by the Huntsville/Madison County Chamber of Commerce at Ditto Landing Pavilion on September 22, 2015. The purpose of the event is to celebrate the Space and Defense industry relationships with the community and the positive effect it has on the Huntsville and Madison County Area.

This event will be a widely-attended gathering of approximately 300 people, including representatives of Redstone Arsenal, NASA's Marshall Space Flight Center, and other government representatives, the aerospace industry, small businesses, local elected officials, and the community. A buffet dinner with cocktails will be served at a cost of approximately \$25 per person. The event is fully funded by the Huntsville/Madison County Chamber of Commerce. 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 cost of this event, I have determined that the value to the agency in having 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. Employees must pay separately for a spouse or guest. NASA employees whose duties may substantially affect the Huntsville/Madison County Chamber of Commerce, or a majority of its members, 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.

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