

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



November 2, 2015

Reply to Attn of: LS01 (LLD)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Employees With Senior Institutional Responsibilities to Attend the 2015 Huntsville State of the City Address

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

Certain NASA employees with senior institutional and external relations responsibilities have been invited to attend Mayor Battle's Huntsville State of the City Address. This event is scheduled for Friday, November 6, at the North Hall Von Braun Center, Huntsville, AL. There will be a luncheon provided during the address from 12:00 noon to 1:15 pm.

This event will be a widely-attended gathering of local elected officials and representatives from federal agencies, Huntsville/Madison County Chamber of Commerce members and employees, community and business leaders, private industry, and local media. The event is valued at \$35.00 per person. Approximately 900 people are expected to attend. This event is sponsored by the Huntsville/Madison County Chamber of Commerce and several area businesses, including NASA contractors.¹

Several of the sponsors of this event are currently providing contractual services to NASA, or will seek to provide contractual services to NASA in the future. Some NASA personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to the Chamber of Commerce or these companies in their pursuit to provide, or in their contractual relationship with NASA. These personnel are similarly situated in that they each have Senior Institutional and external relationship responsibilities that could significantly influence current or future contracts with the Chamber of Commerce or these listed companies.

¹ Businesses include: Toyota Motor Manufacturing Alabama, Aerojet Rocketdyne (NASA contractor), Beason & Nailey, Inc., The Boeing Company (NASA contractor), COLSA Corporation, Port of Huntsville, PPG Aerospace, Regions Bank, Davidson Technologies, Inc., Digium, Inc., Public Financial Management, Inc., and Science Applications International Corporation (NASA contractor).

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 attendance of these senior institutional and external relations employees, the Marshall Space Flight Center Center Director, Deputy Director, Associate Director (Technical), and the Director of the Office of Strategic Analysis & Communications, at the Huntsville State of the City Address 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 market value of the event, I have determined that the value to the agency in having the listed employees attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties. Attendance of these employees at this event would be in the best interest of NASA, since it will further NASA programs and operations. Accordingly, these employees may accept free attendance at the event.

The Huntsville/Madison County Chamber of Commerce is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act. However, several of the corporate sponsors 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 sponsor to reimburse the \$35 cost of the reception for themselves and their spouse or guest.²

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


Audrey D. Robinson
Chief Counsel

² Sponsors identified as lobbying organizations are: Aerojet Rocketdyne, The Boeing Company, PPG Aerospace, Regions Bank, Science Applications International Corporation, and Toyota Motor Manufacturing Alabama.