

National Aeronautics and Space Administration
Kennedy Space Center
Kennedy Space Center, FL 32899



October 8, 2015

Reply to Attn of: CC-A

TO: Distribution

FROM: AA-B/Associate Director

SUBJECT: Determination Regarding Attendance by Certain NASA Employees at the Economic Development Commission (EDC) Annual Meeting, October 21, 2015

On October 21, 2015, the EDC will hold its annual meeting at the Titusville Playhouse in Titusville, Florida. The events include a networking reception and program. Approximately 250-300 guests have been invited to this event. These guests are EDC investors; they include industry leaders, Brevard city officials, representatives from aerospace contractors, local businesses, academia, and the media. The cost is \$40 a person.

In accordance with 5 C.F.R. § 2635.204(g), Widely Attended Gatherings and Other Events, I find this event meets the requirements of a widely attended gathering, and I further determine that there is an Agency interest in having NASA personnel attend this event because their attendance will further agency programs and operations. Specifically, attendees will be in a diverse forum conducive to disseminating information on NASA's ongoing and future activities and discussing matters of interest to NASA. Although all invitees are participants in Kennedy Customer Agreement 4329, Kennedy Space Center's Space Act Agreement with the EDC, this agreement is a nonreimbursable, nonexclusive cooperative agreement that does not involve the exchange of funds. Having considered the recommendations from the Office of Chief Counsel and the factors that 5 C.F.R. § 2635.207(g)(3)(i) specifies as relevant to the analysis, I have determined that employee participation in the event outweighs the concern that acceptance of the gift of free attendance may or may appear to improperly influence them in the performance of their official duties.

Accordingly, NASA employees who have been invited to attend may accept free attendance to this event.


Kelvin Manning
Agency Designee

Distribution:

AA/Mr. Cabana
AA-A/Ms. Petro

AD/Mr. Colloredo
AD/Mr. Pierce

AD/Ms. Potts