

National Aeronautics and Space Administration
George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812 February 17, 2016



Reply to Attn of:

LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Determination Regarding Attendance by NASA Marshall Space Flight Center Senior Employees, and Those With Space Launch System and External Relations Responsibilities at the SLS/Orion Suppliers' Conference and Reception on February 23-24, 2016

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

On February 23 and 24, 2016, Boeing Company, Lockheed Martin, Aerojet Rocketdyne, and Orbital ATK, will host the Annual SLS-Orion Suppliers' Conference at the Liaison Capitol Hill Hotel in Washington, D.C. with a reception in the Rayburn Building, Gold Room #2168. The purpose of this conference is to inform SLS and Orion suppliers of the current status of the programs. The event will consist of conference presentations and discussions over the two days, with a luncheon on the first day and a reception on the first evening.

Several NASA MSFC employees who have senior institutional and Space Launch System (SLS) project responsibilities and external relations responsibilities have been invited to attend the SLS/Orion Suppliers Congressional Reception¹. This event is sponsored by these SLS Suppliers: Aerojet Rocketdyne, Orbital ATK, Boeing, and Lockheed Martin. The reception is scheduled for Tuesday, February 23, 2016, from 6 to 8 pm, at the Rayburn House Office Building - Gold Room.

All of these Suppliers are currently providing contractual services to NASA. Some NASA personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to these Suppliers in their pursuit to provide, or seek to provide, contractual services to NASA. These personnel are similarly situated in that they each have Senior Institutional or Project responsibilities that could significantly influence current or future contracts for these companies.

¹ Center Director; Program Manager and Deputy Program Manager of Space Launch System Program; Director of the Office of Strategic Analysis & Communications; OSAC Legislative Director; and Management Interns to the Director.

Approximately 200 people have been invited to attend, including members of Congress and their staff, personnel from academia and industry, and employees of other Federal agencies. The estimated average value of refreshments served at the event, including all food and refreshments, is \$25 per person. I find that the event meets the requirements of a “widely-attended gathering” as defined 5 CFR §2635.204(g)(2).

I further determine that there is an Agency interest in having these NASA employees attend the event because it will further Agency programs and operations. Attendance at the event will allow NASA attendees to exchange information regarding NASA programs and hear views that relate to NASA’s policies and plans from representatives of various sectors. Accordingly, NASA employees in the positions identified may accept free attendance at the event.

Aerojet, Boeing, Lockheed Martin, and Orbital ATK 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 \$25 cost of the reception for themselves.

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

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

Audrey D. Robinson
Chief Counsel