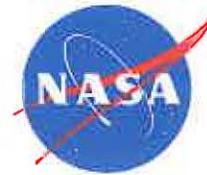


National Aeronautics and Space Administration
George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812



July 18, 2016

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 National Space Club - Huntsville Breakfast Meeting

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 the National Space Club Huntsville Chapter July Breakfast on July 19, 2016, at the Jackson Center in Huntsville.

The National Space Club - Huntsville Chapter was founded in 1985 to further the aims locally of the National Space Club. The National Space Club endeavors to foster excellence in space activity through interaction between industry and government, and through a continuing program of educational support. Through its programs, activities, and awards, it works to promote space leadership and education. Its members include numerous NASA contractors.

This event will be a widely-attended gathering of NASA personnel; aerospace and defense industry representatives; community leaders; federal, state and local government officials; academia, and members of the press. Breakfast tickets cost \$20 per person and approximately 150 individuals have been invited to attend. This event is sponsored by the National Space Club - Huntsville Chapter and many of its member businesses, including NASA contractors.¹

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 Center Director, Deputy Director, all direct reports, and Senior Executive Service employees. These employees are similarly situated in that they each have

¹ Businesses include: Jacobs Engineering Group (NASA contractor), Dynetics (NASA contractor), The Boeing Company (NASA contractor), Orbital ATK (NASA contractor), Aerojet Rocketdyne (NASA contractor), Science Applications International Corporation (NASA contractor), University of Alabama in Huntsville (NASA contractor), Teledyne Brown Engineering (NASA contractor), Lockheed Martin (NASA contractor), LSINC, Bastion Technologies (NASA contractor), CDW-G (NASA contractor), Ball (NASA contractor), ASRC Federal (NASA contractor), U.S. Space and Rocket Center, Geocent (NASA contractor), DVDRC, and Wyle (NASA contractor).

senior institutional and external relations responsibilities for NASA that may involve significant community relations responsibilities that could influence Space Club programs and activities. Some of these individuals may have duties affecting members of the Space Club.

I have determined that attendance of these senior institutional employees and employees with external relations responsibilities 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 with senior institutional responsibilities attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, these NASA employees may accept free attendance at the event.

The National Space Club 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 \$20 cost of the reception.²

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", followed by a long horizontal line extending to the right.

Audrey D. Robinson
Chief Counsel

² Sponsors identified as lobbying organizations are: Jacobs Engineering Group, The Boeing Company, Orbital ATK, Aerojet Rocketdyne, The Boeing Company, Science Applications International Corporation, Teledyne Brown Engineering, Lockheed Martin, and Wyle Technologies.