

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



August 11, 2015

Reply to Attn of:

LS01 (KPK)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey Robinson

SUBJECT: Blanket Approval for NASA Employees to attend the Aerojet Rocketdyne Post-Test RS-25 Reception on August 13, 2015

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 Aerojet Rocketdyne Post-Test RS-25 Reception on Thursday, August 13, 2015, at 5:30 p.m. at the INFINITY Science Center at Stennis Space Center. This event is to be held in celebration of a successful RS-25 engine test and future steps with the Space Launch Systems (SLS).

This event will be a widely-attended gathering of elected officials, NASA and other government agency personnel, representatives of the aerospace industry, and Aerospace Rocketdyne employees. The event is valued at \$30.00 per person and approximately 200 people, including elected officials, NASA and other government agency personnel, representatives of the aerospace industry, and Aerospace Rocketdyne employees. 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 market value 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. They may also accept invitations for accompanying spouses or guests. NASA employees whose duties may substantially affect Aerojet Rocketdyne 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.

Aerojet Rocketdyne is a lobbying organization and is registered as such under the Lobbying Disclosure Act. 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 \$30 cost of the reception for themselves and their spouse or guest.

Questions about this determination may be addressed to Kristin Pollard Kiel at 256-544-0053.

for James R. Fedor, Acting
Audrey Robinson
Chief Counsel