

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: Approval for Marshall Senior Institutional and Space Launch System (SLS) Program and Procurement Officials 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:

Certain Marshall officials, who have senior institutional and Space Launch System (SLS) program or procurement responsibilities, 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.¹ This event is to be held in celebration of a successful RS-25 engine test and future steps with the Space Launch Systems (SLS).

Aerojet Rocketdyne is an aerospace and defense contractor. Aerospace Rocketdyne currently has several contracts with various NASA centers. Aerospace Rocketdyne's contract responsibilities include Space Launch System (SLS) work providing the liquid engines that will power the vehicle during ascent and into deep space. These engines are the J-2X and RS-25 engines.

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

¹ Marshall Space Flight Center (MSFC) Center Director; Deputy Director; Associate Director; Associate Director, Technical; Manager, Space Launch Program Office (XP01); Deputy Manager, Space Launch System Program Office (XP01); Assistant Program Manager, Space Launch System Program Office (XP01); Deputy, Program Integration Office (XP02); Supervisor, Booster's Office (XP10); Deputy, Stages Office (XP30); Manager, Stages Office (XP30); Supervisor, Ground Operations Liaison Office (XP60); Supervisor, Advanced Development Office (XP70); Chief Engineer and Deputy Chief Engineer for SLS Program; Supervisor and Deputy, Engines Office (XP20); Office Manager, Space Transportation Support Office, Office of Procurement (PS40)

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).

The invited MSFC employees include MSFC Center Director, Deputy Director and other employees in the SLS Program Office or Procurement Office. The NASA senior institutional and program officials listed currently have extensive involvement in matters involving Aerojet Rocketdyne’s business interests. These persons are similarly situated in that they each have institutional and/or program responsibilities for NASA that involve Aerojet Rocketdyne. I have determined that attendance of these senior employees and program officials at the reception 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 senior employees attend this event outweighs any concern that the free attendance may or may appear to improperly influence them in the performance of their duties. Attendance of NASA employees with senior and program responsibilities at this event would be in the best interest of NASA, since it will further NASA programs and operations.

Accordingly, NASA employees in the positions identified and their spouse or guest may accept free attendance at the event. Free attendance by employees whose duties do not affect the sponsor is addressed in a separate determination.

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.


Audrey Robinson
Chief Counsel