

National Aeronautics and Space Administration
George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812 January 27, 2014



Reply to Attn of LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for Four NASA Employees With Senior Institutional Responsibilities to Attend the Madison State of the City Dinner

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

Four NASA employees with senior institutional responsibilities have been invited to attend the Madison State of the City Dinner – Connect 2014. This event is scheduled for Friday, February 7, 2014, at the U.S. Space & Rocket Center Davidson Center for Space Exploration. There will be a cocktail reception at 6:00 p.m., followed by dinner and the State of the City Address at 7:00 p.m.

This event will be a widely-attended gathering of local, state, and federal elected officials, academia, Chamber of Commerce Board of Directors, community and business leaders, and industry representatives. The event is valued at \$95.00 per person and \$175 per couple. Approximately 500 people are expected to attend. This event is sponsored by the Madison Chamber of Commerce and several of its local small business members which are not prohibited sources. Intergraph is the only sponsor which is a NASA prohibited source, and it is one of many sponsors. Any NASA employee who has duties affecting Intergraph should seek a separate opinion from the Office of Chief Counsel.

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 MSFC Center Director, Deputy Director, and the Director and Deputy Director of the Office of Center Operations, and their spouse or guest. These four NASA employees are similarly situated in that they each have senior institutional responsibilities for NASA that may involve significant community relations responsibilities that could influence Chamber programs and activities. I have determined that attendance of these senior institutional employees at the Madison State of the City Dinner 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 governmental 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 institutional employees attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties. Attendance of NASA employees with senior institutional 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.

The Madison Chamber of Commerce and Intergraph are not lobbying organizations and are not registered as such under the Lobbying Disclosure Act.

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". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Audrey D. Robinson
Chief Counsel