

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



April 7, 2015

Reply to Attn of:

LS01 (KMH)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Employees to Attend the Montgomery Chamber of Commerce NASA Procurement Suppliers Conference

In accordance with 5 CFR § 2635.204(g)(2 and (3), I make the following determination:

Several NASA employees have been invited to attend the NASA Procurement Suppliers Conference hosted by the Montgomery Chamber of Commerce (Chamber) and several co-sponsors¹. NASA is not a co-sponsor of this event, but is providing several speakers. The conference will be at The Warehouse in Montgomery, Alabama with a breakfast and a box lunch on April 8, 2015, beginning at 9:00 AM and ending at 4:00 PM. The event is held to provide a forum for small and large businesses to connect with NASA program representatives and prime contractors and learn about programs featuring the Space Launch System Program Office and business opportunities. The Acting Director of the Office of Strategic Analysis and Communications, Manager of the Flight Programs and Partnerships Office, and the Small Business Procurement Analyst of the Office of Procurement will be speaking.

This event will be a widely-attended gathering of NASA personnel and members from Montgomery's academia, aerospace industry, other local businesses, local government, and Chamber employees. The event will facilitate thoughtful discussion between these professionals and stakeholders in the aerospace community.

Conference tickets cost \$50 per person and approximately 200 individuals have been invited to attend. The event is co-sponsored by the Montgomery Chamber of Commerce, which is classified as a 501(c)(3), and several local businesses. The co-sponsors of this event are seeking to do business with NASA or are already NASA

¹ Co-sponsors include Alabama State University Small Business Development Center, Certified Technical Experts, Goodwyn Mills & Cawood, Inc., Hodges Warehouse, Supreme Cleaning, IAP Worldwide Services, and Southeast Cherokee Construction.

contractors, and therefore considered prohibited sources. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g)(2).

The Chamber is a lead economic development organization for the area of Montgomery and the River Region. The Chamber's mission is to provide assistance for business expansion and recruitment, development and nurturing of entrepreneurial and minority businesses, tourism and convention development, and delivering information regarding military and federal affairs. Members of the Chamber include many NASA contractors and suppliers. Some of the Chamber members and additional sponsors of this event are NASA contractors that are currently providing support to various projects at Marshall Space Flight Center.

I have determined that attendance at the above mentioned conference is in the interest of NASA because it will further agency programs and operations, help to raise NASA's profile with academia, industry leaders, and government leaders; enhance community relations; and support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the conference, NASA's interest in it, the broad attendance anticipated, and the market value of the 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. Employees' guests are not invited. NASA employees whose duties may substantially affect the Chamber and its co-sponsors are not covered in this determination and should seek a specific determination from this office pursuant to 5 CRF 2635.204(g)(3)(i) regarding their participation in this event.

Goodwyn Mills & Cawood, Inc. is a registered lobbyist 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 sponsors to reimburse the cost of the ticket for this event.

Questions about this determination may be addressed to Kristine Hamilton at 256-544-0011.



Audrey D. Robinson
Chief Counsel

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



April 7, 2015

Reply to Attn of:

LS01 (KMH)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Employees with Procurement, Programmatic, and External Relations Duties to Attend the Montgomery Chamber of Commerce NASA Procurement Suppliers Conference

In accordance with 5 CFR § 2635.204(g)(2 and (3), I make the following determination:

Several NASA employees¹ with procurement, programmatic, and external relations duties that may affect one or more sponsors have been invited to attend the NASA Procurement Suppliers Conference hosted by the Montgomery Chamber of Commerce (Chamber) and several co-sponsors². NASA is not a co-sponsor of this event, but is providing several speakers. The conference will be at The Warehouse in Montgomery, Alabama with a breakfast and a box lunch on April 8, 2015, beginning at 9:00 AM and ending at 4:00 PM. The event is held to provide a forum for small and large businesses to connect with NASA program representatives and prime contractors and learn about the Space Launch System Program and business opportunities. The Acting Director of the Office of Strategic Analysis and Communications, Manager of the Flight Programs and Partnerships Office, and the Small Business Procurement Analyst of the Office of Procurement will be speaking.

This event will be a widely-attended gathering of NASA personnel and members from Montgomery's academia, aerospace industry, other local businesses, local government, and Chamber employees. The event will facilitate thoughtful discussion between these professionals and stakeholders in the aerospace community.

Conference tickets cost \$50 per person and approximately 200 individuals have been invited to attend. The event is co-sponsored by the Montgomery Chamber of

¹ Procurement Analyst and Contract Specialist for the MSFC Small Business Program; MSFC SBIR/STTR Tech Infusion Manager; Associate Program Manager for the SLS Program Office; Manager for the Flight Program and Partnerships Office; Acting Director of the Office of Strategic Analysis and Communications; and Supervisor of the External Relations Office.

² Co-sponsors include Alabama State University Small Business Development Center, Certified Technical Experts, Goodwyn Mills & Cawood, Inc., Hodges Warehouse, Supreme Cleaning, IAP Worldwide Services, and Southeast Cherokee Construction.

Commerce, which is classified as a 501(c)(3), and several local businesses. The co-sponsors of this event are either seeking to do business with NASA or are already NASA contractors, and therefore considered prohibited sources. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g)(2).

The Chamber is a lead economic development organization for the area of Montgomery and the River Region. The Chamber's mission is to provide assistance for business expansion and recruitment, development and nurturing of entrepreneurial and minority businesses, tourism and convention development, and delivering information regarding military and federal affairs. Members of the Chamber include many NASA contractors and suppliers. Some of the Chamber members and additional sponsors of this event are NASA contractors that are currently providing support to various projects at Marshall Space Flight Center. Employees covered by this determination presently, or may in the near future, have extensive involvement in matters relating to one or more of these contractors' business interests.

I have determined that attendance at the above mentioned conference is in the interest of NASA because it will further agency programs and operations, help to raise NASA's profile with academia, industry leaders, and government leaders; enhance community relations; and support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the conference, NASA's interest in it, the broad attendance anticipated, and the market value of the 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. Employees' guests are not invited.

Goodwyn Mills & Cawood, Inc. is a registered lobbyist 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 sponsors to reimburse the cost of the ticket for this event.

Questions about this determination may be addressed to Kristine Hamilton at 256-544-0011.

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