

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



April 10, 2014

Reply to Attn of:

LS01 (KPK)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey Robinson

SUBJECT: Blanket Approval for MSFC Employees to attend the National Space Club – Huntsville Breakfast with Congressman Robert Aderholt on April 15, 2014

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

NASA employees have been invited to attend the National Space Club – Huntsville Chapter Breakfast with Congressman Robert Aderholt on Tuesday, April 15, 2014, at 7:30 a.m. at the U.S. Space & Rocket Center Davidson Center for Space Exploration.

The National Space Club – Huntsville Chapter was founded in 1985 to further the aims locally of the National Space Club. The National Space Club is the foremost entity devoted to fostering 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, representatives of the aerospace industry, Congressional staff, academia, community leaders, and elected officials. The event is valued at \$20.00 per person and approximately 200 people, including corporate executives, representatives of the aerospace & defense contractors, government officials, academia, aviation enthusiasts and members of the press have been invited to attend. 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 the National Space Club, or a majority of its members, 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.

The National Space Club is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

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

  
Audrey D. Robinson  
Chief Counsel