

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: Approval for NASA Employees with Senior Institutional Responsibilities 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 with senior institutional responsibilities 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).

The invited MSFC employees are MSFC Center Director, Deputy Director and all direct reports and deputies. These employees are similarly situated in that they each have senior institutional responsibilities for NASA that may involve significant community relations responsibilities that could influence Space Club programs and activities. Some of these individuals may have duties affecting members of the Space Club. I have

determined that attendance of these senior institutional employees at the breakfast 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 institutional 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 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 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