National Aeronautics and Space Administration

George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812

January 30, 2014

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Senior Institutional and External Relations Employees to attend the Washington Update Breakfast

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

Certain NASA senior institutional and external relations employees have been invited to attend the Washington Update Breakfast at the Von Braun Center North Hall. This event will take place on February 18, 2014, and is sponsored by the Huntsville/Madison County Chamber of Commerce (Chamber). This event is held to update community leaders, military leaders, and NASA leaders on issues that Senator Sessions considers important to the community.

The Chamber of Commerce is the lead economic development organization for Huntsville/ Madison County, providing assistance for business expansion and recruitment, and delivering information regarding available sites, labor force, workforce development, taxation, finance programs and incentives. Members of the Chamber of Commerce include many NASA contractors and suppliers.

The breakfast will be a widely-attended gathering of community leaders, aerospace and defense industry representatives, local elected officials, and military and NASA leaders. Breakfast tickets cost $35 per person and approximately 1200 individuals have been invited to attend. The reception is fully funded by the Chamber. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

Attendance of certain NASA senior institutional and external relations employees[1] at this event would be in the best interest of NASA, since it will further NASA programs and operations. These employees are similarly situated because they may have, or soon may have, duties that involve significant community relations responsibilities that could significantly influence Chamber programs and activities and may substantially affect the Chamber's interests or the interests of a majority of the Chamber's members.

[1] Center Director, Deputy Director, Director and Deputy Director of the Office of Strategic Affairs and Communications.

I have determined that attendance of these senior institutional and external relations employees at the Washington Update 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 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 and external relations 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, these senior institutional and external relations employees may accept free attendance at the event.

The Huntsville/Madison County Chamber of Commerce is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.

Audrey D. Robinson
Chief Counsel