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601 Massachusetts Ave., NW Washington, DC 20001-3743

August 5, 2016

VIA EMAIL AND EXPRESS U.S. MAIL

Martha Terry NASA Headquarters 300 E Street, SW Room 5Q16 Washington, DC 20546

Re: 16-HQ-F-0086 Expedited Request for Records Under the Freedom of Information Act

Dear Ms. Terry:

I am writing in response to your July 19, 2016 letter acknowledging our July 11, 2016 FOIA request on behalf of Dr. Nathan Myhrvold. Copies of our July 11, 2016 FOIA request and your July 19, 2016 acknowledgment letter are attached as Exhibits A and B respectively.

In your July 19, 2016 letter, you stated that NASA is "unable to process" our request because NASA does not understand what specific NASA records we are requesting, and from what particular office or location. However, you invited us to provide additional clarification within 20 working days.

We believe our July 11, 2016 request already sufficiently identified the documents Dr. Myhrvold is seeking and contained enough information to enable NASA to process the request. Moreover, we believe your July 19, 2016 letter's rejection of our request was not consistent with either FOIA or NASA's own regulations, 14 C.F.R. § 1206.301(b). As acknowledged in your letter, a requester is simply required to describe the records sought so that a knowledgeable official can locate the records with a reasonable amount of effort. This may include provision of information about "the circumstances that resulted in the record being created or the date and circumstances surrounding the event the record covers." Our July 11, 2016 requests met that standard by providing the names of specific agency personnel, specific agency offices, specific documents and news articles, specific topics, and specific events. That should have been

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sufficient to enable the NASA personnel knowledgeable about the underlying events to identify relevant records, including via searches of email accounts.

Nevertheless, in the spirit of cooperation and the hope of promptly obtaining the relevant records and avoiding unnecessary litigation, we provide below additional information designed to help NASA fulfill its statutory obligation to conduct a reasonable search for records responsive to our July 11, 2016 request.

1. Clarification of Request

In order to help NASA formulate an appropriate search for records responsive to our request, we identify the following personnel, offices and directorates as familiar with and involved in the subject matter of the request:

- Administrator Charlie Bolden;
- Deputy Administrator Dava Newman;
- Chief of Staff Michael French:
- Chief Scientist Ellen Stofan;
- Chief Technologist David Miller;
- Associate Administrator David Weaver;
- Lindley Johnson of the Science Mission Directorate.

Further, we identify the date range of January 1, 2016 through July 9, 2016 as the relevant time period for which records are sought.

Below we provide additional clarification and suggestions with respect to each specific request:

- All documents¹ related to Nathan Myhrvold, his research, and his inquiries to NASA's NEOWISE team and to other NASA officials. Subject matter of such documents may include:
 - Nathan Myhrvold's claims regarding Kirchhoff's law;
 - Nathan Myhrvold's inquiries leading up to the attached paper Comparing NEO Search Telescopes; and
 - iii. Nathan Myhrvold's inquiries about NEOWISE.

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NASA officials, including Lindley Johnson of the Science Mission Directorate, have made high-profile, public statements within the last few months regarding Nathan Myhrvold and Mr. Myhrvold's criticism of NEOWISE. As such, it is highly likely that Mr. Johnson and others have email correspondence referencing Mr. Myhrvold and the issues described. NASA may conduct a search with reasonable effort by searching the email accounts of Mr. Johnson and others working with him on these issues for references to Mr. Myhrvold, and by consulting with the same personnel to identify and locate any other electronic or paper files that may exist relating to Mr. Myhrvold and the topics in our request.

- a. Nathan Myhrvold
- b. Nathan Myhrvold's claims regarding Kirchhoff's law;
- c. Nathan Myhrvold's inquiries leading up to the attached paper Comparing NEO Search Telescopes; and
- d. Nathan Myhrvold's inquiries about NEOWISE.
- b. All documents referencing the following articles (as a courtesy, we have attached a compilation of these articles to this request):

This request precisely identified five specific articles by author, title, date, publication, and website URL address. Each of the articles was published between May 23 and 27, 2016 and discusses Mr. Myhrvold's criticism of NASA and NASA's response thereto. Similar to request (a), NASA can search for responsive documents by searching the email accounts of Mr. Johnson and other involved personnel for references to these articles and by inquiring with them about whether any other files exist that would relate to these articles. Further, the date range for request (b) is even narrower than the overall

¹ See, e.g., Kenneth Chang, How Big Are Those Killer Asteroids? A Critic Says NASA Doesn't Know, New York Times (May 23, 2016), http://www.nytimes.com/2016/05/24/science/asteroids-nathan-myhrvold-nasa.html ("Space agency officials disagree. 'He's a very smart man,' said Lindley Johnson, who oversees NASA's efforts to protect the planet from space rocks. 'But that doesn't make him an expert in everything.'").

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date range of January 1, 2016 through July 9, 2016, because NASA need only search from the respective late May 2016 publication dates forward.

- All documents discussing the accuracy of NEOWISE diameter estimates, including:
 - i. How the estimates were calculated:
 - ii. How the estimates should be described;
 - iii. Different approaches to calculation; and
 - Policies or decisions regarding the accuracy and how NEOWISE-related papers or presentations should refer to them.
- All documents regarding comments about or criticisms of NEOWISE data analysis by other researchers.
- All documents regarding policies or procedures regarding how to handle inquiries from external researchers about NEOWISE data or results

Finally, for the period of January 1, 2010, to July 9, 2016, NASA may conduct a search with reasonable effort by searching the records and e-mail accounts of the above referenced personnel and offices or directorates, which are familiar with the subject area of the request, for records that include the terms "NEOWISE" and "diameter".

* * *

We believe that particularly taking into account the additional suggestions provided above, we have provided more than "sufficient detail to enable Agency personnel who are familiar with the subject area of the request to identify and locate the record with a reasonable amount of effort." 14 C.F.R. § 1206.301(b). In no way do these requests present the concerns sounded in your letter about "reduc[ing] government agencies to full-time investigators on behalf of requesters" and requiring FOIA staff to "have clairvoyant capabilities to discern the requester's needs," or "spend countless numbers or personnel hours in bureaucratic haystacks." On the contrary, it is likely that many responsive records can be located in a reasonable amount of time simply by

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consulting with Mr. Johnson of the Science Mission Directorate and conducting simple searches of his emails and other records.

2. Request for Expedited Processing

Pursuant to 14 C.F.R. §§ 1206.304 and 1206.400, we hereby renew our request expedited processing of this request. Under 14 C.F.R. § 1206.400(c)(2), Dr. Myhrvold requests the above referenced records under "[c]ircumstances in which there is an urgency to inform the public about an actual or alleged Federal Government activity[.]" In particular, we understand that NASA is considering a proposal to fund NEOCam, a new Near Earth Object ("NEO") program that is led by Amy Mainzer, who is also the principal investigator on the NEOWISE project.² The records Dr. Myhrvold seeks concern the scientific validity of the NEOWISE findings, the scientific approach of that effort, and the relevance of the NEOWISE findings to NEO funding decisions. Accordingly, the records sought above are vital to ensuring a full, frank, and open public discussion regarding the Federal Government's substantial investment in a new NEO program, and such discussion must occur expeditiously as we understand that NASA intends to make final selections by next month (September 2016) regarding continued development of the NEOCam program.³ Thus, the requested information is "the type of information which has particular value that will be lost if not disseminated quickly" as there is very little time for the public to fully and accurately evaluate the science on which this future NEO program would be based. See 14 C.F.R. § 1206.400(c)(2)(ii).

Furthermore, this FOIA request is made by a person primarily engaged in disseminating information. We recognize that "[i]n <u>most</u> situations, a person primarily engaged in disseminating information will be a representative of the news media." 14 C.F.R. § 1206.400(c)(2)(i) (emphasis added). Although Dr. Myhrvold is not technically a member of the press, he writes for the public extensively on scientific matters of public interest and disseminates his work widely, including both via his own widely visited

² See NASA, NASA Selects Investigations for Future Key Plan (Oct. 1, 2015), http://discovery.nasa.gov/news/index.cfml?ID=1148 ("NEOCAM would discover 10 times more near-Earth objects than all NEOs discovered to date. It would also begin to characterize them. Amy Mainzer of JPL is the principal investigator, and JPL would manage the project.")

³ See id.

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website and major media outlets.⁴ Moreover, importantly, Dr. Myhrvold is requesting records not for commercial use but for scientific and public awareness purposes. As demonstrated by his substantial and successful efforts to disseminate publicly available information on the NEOWISE program to date,⁵ Dr. Myhrvold qualifies as a person primarily engaged in disseminating information making his request eligible for expedited treatment.

Dr. Myhrvold certifies that this explanation of a compelling need for this information is true and correct.

3. Administrative and Procedural Matters

We reiterate that FOIA and NASA's regulations provide that if some parts of records containing the requested information are exempt from mandatory disclosure, then non-exempt materials shall be disclosed after the exempt material has been segregated. See 5 U.S.C. § 552(b); 14 C.F.R. § 1206.307(c). Therefore, if you determine some portion of a record that is responsive to this request is exempt, please provide a copy of the remainder of the record. Additionally, if you determine that some or all of the requested records are exempt from disclosure, please provide a list or index of the records withheld, the exemption invoked, an estimation of the volume of records denied, and the reasons why a discretionary release of the records would not be appropriate under FOIA. See 14 C.F.R. § 1206.307(a)-(b).

We are willing to reimburse <u>any and all</u> search and duplication fees related to this request without delay. Please note that this is a change from our original request, which agreed to reimburse up to \$1,000. <u>Since we are no longer limiting the amount we are willing to reimburse</u>, there is no need to prioritize which records are produced first.

Finally, as noted above, Dr. Myhrvold is requesting records <u>not</u> for commercial use but for scientific and public awareness purposes. Dr. Myhrvold intends to review and

⁴ See, e.g., http://www.nathanmyhrvold.com/; http://www.nathanmyhrvold.com/index.php/essays-columns (listing thirty-two publications in major press outlets, including The Wall Street Journal, The Washington Post, Slate, Bloomberg View, Scientific American, Time, and Fortune).

⁵ See Nathan Myhrvold, A Simple Guide to NEOWISE Data Problems (May 25, 2016), https://medium.com/@nathanmyhrvold/a-simple-guide-to-neowise-data-problems-a93f41e3bdb4#.btfdnbjds; see also the list of major press articles detailing Dr. Myhrvold's criticism of the NEOWISE project in section 2.b of this letter.

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analyze the requested records and to make them public, free of charge, through his website as well as through journalistic publications that are interested in publishing such findings. Therefore, we believe Dr. Myhrvold falls into fee category "[a]ll other requesters." *See* 14 C.F.R. § 1206.507(c)(4).

In accordance with Section 7 of the OPEN Government Act of 2007, Pub. L. No. 110-175, please provide the telephone number or internet URL that requesters can use to inquire about the status of their requests.

Thank you for your consideration of this clarification of our initial request. Please direct all future responses to my attention at:

Ronald D. Lee Arnold & Porter LLP 601 Massachusetts Ave., NW Washington, D.C. 20001

Tel:

202.942.5380

Fax:

202.942.5999

Email:

ronald.lee@aporter.com

If you need to reach someone by telephone about this request, you also may contact my associate, Tom McSorley, at 202.942.5668.

Sincerely,

(Signature redacted)

Ronald D. Lee

Attachments:

- A. Initial FOIA Request 16-HQ-F-0086
- B. NASA Response to FOIA Request 16-HQ-F-0086

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August 5, 2016

VIA EMAIL AND EXPRESS U.S. MAIL

Miriam Brown-Lam Principal Agency FOIA Officer and Chief Public Liaison

Dennis B. Mahon
JPL FOIA Public Liaison Officer

NASA Management Office 4800 Oak Grove Drive M/S: 180-200K Pasadena, CA 91109-8001

Re: 16-JPL-F-00800 Expedited Request for Records Under the Freedom of Information Act

Dear Ms. Brown-Lam and Mr. Mahon:

I am writing in response to your July 18, 2016 letter acknowledging our July 11, 2016 FOIA request on behalf of Dr. Nathan Myhrvold. Copies of our July 11, 2016 FOIA request and your July 18, 2016 acknowledgment letter are attached as Exhibits A and B respectively.

In your July 18, 2016 letter, you stated that JPL is "unable to process" our request because JPL does not understand what specific JPL records we are requesting. However, you invited us to provide additional clarification within 20 working days.

We believe our July 11, 2016 request already sufficiently identified the documents Dr. Myhrvold is seeking and contained enough information to enable JPL to process the request. Moreover, we believe your July 18, 2016 letter's rejection of our request was not consistent with either FOIA or NASA's own regulations, 14 C.F.R. § 1206.301(b). As acknowledged in your letter, a requester is simply required to describe the records sought so that a knowledgeable official can locate the records with a reasonable amount of effort. This may include provision of information about "the

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circumstances that resulted in the record being created or the date and circumstances surrounding the event the record covers." Our July 11, 2016 requests met that standard by providing the names of specific agency personnel, specific agency offices, specific documents and news articles, specific topics, and specific events. That should have been sufficient to enable the JPL personnel knowledgeable about the underlying events to identify relevant records, including via searches of email accounts.

Nevertheless, in the spirit of cooperation and the hope of promptly obtaining the relevant records and avoiding unnecessary litigation, we provide below additional information designed to help JPL fulfill its statutory obligation to conduct a reasonable search for records responsive to our July 11, 2016 request.

1. Clarification of Request

In order to help JPL formulate an appropriate search for records responsive to our request, we identify the following personnel, offices and directorates as familiar with and involved in the subject matter of the request:

- NEOWISE team, including specific NASA personnel:
 - o Amy Mainzer (JPL),
 - o Joseph Masiero (JPL),
 - o Lindley Johnson (NASA), Dr. Mainzer
 - o Thomas Statler (NASA), and all other NEOWISE team members and affiliated personnel;
- Special Agent Michael Harrison, Office of the Inspector General JPL;
- Director Michael Watkins;
- Deputy Director Larry James;
- Chief Scientist Daniel McCleese:
- Director David B. Gallagher, Astronomy, Physics and Space Technology Directorate JPL;
- Director Leslie L. Livesay, Engineering and Science Directorate JPL; and
- Director Marcus A. Watkins, JPL division of the NASA Management Office.

Further, except to the extent otherwise specifically stated for a specific request below, we identify the date range of January 1, 2016 through July 9, 2016 as the relevant time period for which records are sought. Below we provide additional clarification and suggestions with respect to each specific request:

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- a. All documents¹ related to Nathan Myhrvold, his research, and his inquiries to NASA's NEOWISE team and to other NASA officials. Subject matter of such documents may include:
 - i. Nathan Myhrvold's claims regarding Kirchhoff's law;
 - Nathan Myhrvold's inquiries leading up to the attached paper Comparing NEO Search Telescopes; and
 - iii. Nathan Mylnvold's inquiries about NEOWISE.

JPL personnel, including Amy Mainzer, the principal investigator for NEOWISE at JPL, have made high-profile, public statements within the last few months regarding Nathan Myhrvold and his criticism of NEOWISE. As such, it is highly likely that Dr. Mainzer and others at JPL have email correspondence referencing Dr. Myhrvold and the issues described. JPL may conduct a search with reasonable effort by searching the email accounts of Dr. Mainzer and other JPL personnel working with her on NEOWISE for references to Dr. Myhrvold, and by consulting with the same personnel to identify and locate any other electronic or paper files that may exist relating to Dr. Myhrvold and the topics in our request.

 All documents referencing the following articles (as a courtesy, we have attached a compilation of these articles to this request):

This request precisely identified five specific articles by author, title, date, publication, and website URL address. Each of the articles was published between May 23 and 27, 2016 and discusses Dr. Myhrvold's criticism of NASA and JPL and NASA/JPL's response thereto. Similar to request (a), JPL can search for responsive documents by searching the email accounts of Ms. Mainzer and other involved JPL personnel for references to these articles and by inquiring with them about whether any

¹ See, e.g., Lee Billings, For Asteroid-Hunting Astronomers, Nathan Myhrvold Says the Sky Is Falling, Scientific American (May 27, 2016), http://www.scientificamerican.com/article/for-asteroid-hunting-astronomers-nathan-myhrvold-says-the-sky-is-falling1/ ("Amy Mainzer, the principal investigator for NEOWISE at the Jet Propulsion Laboratory, says Myhrvold's paper is riddled with mathematical mistakes—including one as basic as confusing an asteroid's diameter with its radius, which results in dramatic miscalculations of some asteroids' sizes.").

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other files exist that would relate to these articles. Further, the date range for request (b) is even narrower than the overall date range of January 1, 2016 through July 9, 2016, because JPL need only search from the respective late May 2016 publication dates forward.

- All documents discussing the accuracy of NEOWISE diameter estimates, including:
 - i. How the estimates were calculated:
 - ii. How the estimates should be described:
 - iii. Different approaches to calculation; and
 - Policies or decisions regarding the accuracy and how NEOWISE-related papers or presentations should refer to them.
- d. All documents regarding comments about or criticisms of NEOWISE data analysis by other researchers.
- All documents regarding policies or procedures regarding how to handle inquiries from external researchers about NEOWISE data or results.

For the period of January 1, 2010, to July 9, 2016, JPL may conduct a search with reasonable effort by searching the records and e-mail accounts of the above referenced personnel and offices or directorates, which are familiar with the subject area of the request, for records that include the terms "NEOWISE" and "diameter".

f. All documents related to papers or analyses regarding WISE/NEOWISE done by the NEOWISE team (see, e.g., the following papers: Mainzer/TMC,² Mainzer/NEO,³ Masiero/MB⁴), including:

This request referenced specific scientific papers regarding WISE/NEOWISE done by the NEOWISE team by authors, title, publication, and numerical record. Given the nature of the analysis presented in these papers, there must be other documents and records (e.g., workpapers, email discussions relating to the papers, data sets) associated with them. JPL can search for such documents by consulting with the authors,

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identifying files associated with these papers, and searching the authors' emails. For this request, please note that since the papers were published in 2011, we are not limiting our request to documents between the date range January 1, 2016 through July 9, 2016.

h. All correspondence about NEOWISE or any of the above topics to or from:

Finally, for the same time period (January 1, 2010, to July 9, 2016), JPL can with reasonable effort search the records and e-mail accounts of the above referenced personnel and offices or directorates, which are familiar with the subject area of the request, for correspondence exchanged between JPL employees and the following individuals:

- a. Edward Wright (UCLA);
- b. Tommy Grav (Planetary Sciences Institute);
- c. Timothy Spahr (originally at Minor Planet Center, more recently elsewhere).

* * *

We believe that particularly taking into account the additional suggestions provided above, we have provided more than "sufficient detail to enable Agency personnel who are familiar with the subject area of the request to identify and locate the record with a reasonable amount of effort[.]" 14 C.F.R. § 1206.301(b). In no way do these requests present the concerns sounded in your letter about "reduc[ing] government agencies to full-time investigators on behalf of requesters" and requiring FOIA staff to "have clairvoyant capabilities to discern the requester's needs," or "spend countless numbers or personnel hours in bureaucratic haystacks." On the contrary, it is likely that responsive records can be located in a reasonable amount of time simply by consulting with Dr. Mainzer and conducting simple searches of her email and other records.

We also wish to clarify a couple of matters in response to your July 18, 2016 response. In that letter, you express concern that the requests require a search of "a host" of contract and procurement files. The requests have nothing to do with contract and procurement issues.

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Second, you state that "[b]y providing 'references' and/or 'articles' and web links [we] may be implying that [we] expect NASA to assist in the research of your request or verify information you have provided." We provided references, articles, and web links in order to give JPL the specific information and context necessary to process our requests, which is exactly what your letter and the governing NASA regulations call for.

Third, you note that "clicking on provided web links is a security issue and ultimately a requester is required to articulate in the request the supporting information." As part of our effort to enable JPL to locate responsive records with a reasonable amount of effort, we also included full-text copies of the referenced articles within our request itself.

Fourth, you observe that JPL is "not equipped or required to perform records searches using random terms." The search methodologies we have suggested are designed to target and elicit the relevant information.

Finally, we request clarification of your statement that "NASA has not yet implemented a records management for automated capture and control of e-records; therefore official files are primarily paper files and official records are filed in accordance with the NASA Records Retention Schedules, NRRS 144.1." We believe FOIA clearly encompasses both paper and electronic records and that searching only paper files would be plainly inadequate under FOIA and governing case law.

2. Request for Expedited Processing

Pursuant to 14 C.F.R. §§ 1206.304; 1206.400, we hereby renew our request expedited processing of this request. Under 14 C.F.R. § 1206.400(c)(2), Dr. Myhrvold requests the above referenced records under "[c]ircumstances in which there is an urgency to inform the public about an actual or alleged Federal Government activity[.]" In particular, we understand that NASA is considering a proposal to fund NEOCam, a new Near Earth Object ("NEO") program that is led by Amy Mainzer, who is also the principal investigator on the NEOWISE project.² The records Dr. Myhrvold seeks concern the scientific validity of the NEOWISE findings, the scientific approach of that

² See NASA, NASA Selects Investigations for Future Key Plan (Oct. 1, 2015), http://discovery.nasa.gov/news/index.cfml?ID=1148 ("NEOCAM would discover 10 times more near-Earth objects than all NEOs discovered to date. It would also begin to characterize them. Amy Mainzer of JPL is the principal investigator, and JPL would manage the project.")

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effort, and the relevance of the NEOWISE findings to NEO funding decisions. Accordingly, the records sought above are vital to ensuring a full, frank, and open public discussion regarding the Federal Government's substantial investment in a new NEO program, and such discussion must occur expeditiously as we understand that NASA intends to make final selections by next month (September 2016) regarding continued development of the NEOCam program.³ Thus, the requested information is "the type of information which has particular value that will be lost if not disseminated quickly" as there is very little time for the public to fully and accurately evaluate the science on which this future NEO program would be based. *See* 14 C.F.R. § 1206.400(c)(2)(ii).

Furthermore, this FOIA request is made by a person primarily engaged in disseminating information. We recognize that "[i]n most situations, a person primarily engaged in disseminating information will be a representative of the news media." [CITE] (emphasis added). Although Dr. Myhrvold is not technically a member of the press, he writes for the public extensively on scientific matters of public interest and disseminates his work widely, including both via his own widely visited website and major media outlets. Moreover, importantly, Dr. Myhrvold is requesting records not for commercial use but for scientific and public awareness purposes. As demonstrated by his substantial and successful efforts to disseminate publicly available information on the NEOWISE program to date, Dr. Myhrvold qualifies as a person primarily engaged in disseminating information, making his request eligible for expedited treatment.

Dr. Myhrvold certifies that this explanation of a compelling need for this information is true and correct.

³ See id.

⁴ See, e.g., http://www.nathanmyhrvold.com/; http://www.nathanmyhrvold.com/index.php/essays-columns (listing thirty-two publications in major press outlets, including The Wall Street Journal, The Washington Post, Slate, Bloomberg View, Scientific American, Time, and Fortune).

⁵ See Nathan Myhrvold, A Simple Guide to NEOWISE Data Problems (May 25, 2016), https://medium.com/@nathanmyhrvold/a-simple-guide-to-neowise-data-problems-a93f41e3bdb4#.btfdnbjds; see also the list of major press articles detailing Dr. Myhrvold's criticism of the NEOWISE project in section 2.b of this letter.

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3. Administrative and Procedural Matters

We reiterate that FOIA and NASA's regulations provide that if some parts of records containing the requested information are exempt from mandatory disclosure, then non-exempt materials shall be disclosed after the exempt material has been segregated. See 5 U.S.C. § 552(b); 14 C.F.R. § 1206.307(c). Therefore, if you determine some portion of a record that is responsive to this request is exempt, please provide a copy of the remainder of the record. Additionally, if you determine that some or all of the requested records are exempt from disclosure, please provide a list or index of the records withheld, the exemption invoked, an estimation of the volume of records denied, and the reasons why a discretionary release of the records would not be appropriate under FOIA. See 14 C.F.R. 1206.307(a)-(b).

We are willing to reimburse <u>anv and all</u> search and duplication fees related to this request without delay. Please note that this is a change from our original request, which agreed to reimburse up to \$1,000. <u>Since we are no longer limiting the amount we are willing to reimburse, there is no need to prioritize which records are produced first.</u>

Finally, JPL has indicated that it does not believe we provided sufficient information in our initial request to determine whether our request falls into the fee category for "[a]ll other requesters." *See* 14 C.F.R. § 1206.507(c)(4). As noted above, Dr. Myhrvold is requesting records <u>not</u> for commercial use but for scientific and public awareness purposes. Dr. Myhrvold intends to review and analyze the requested records and to make them public, free of charge, through his website as well as through journalistic publications that are interested in publishing such findings. Therefore, we believe Dr. Myhrvold falls into fee category "[a]ll other requesters."

In accordance with Section 7 of the OPEN Government Act of 2007, Pub. L. No. 110-175, please provide the telephone number or internet URL that requesters can use to inquire about the status of their requests.

Thank you for your consideration of this clarification of our initial request. Please direct all future responses to my attention at:

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August 5, 2016 Page 9

Fax:

202.942.5999

Email:

ronald.lee@aporter.com

If you need to reach someone by telephone about this request, you also may contact my associate, Tom McSorley, at 202.942.5668.

Sincerely,

(Signature redacted)

Ronald D. Lee

Attachments

- A. Initial FOIA Request 16-JPL-F-00800
- B. JPL Response to FOIA Request 16-JPL-F-00800