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Program Executive Office
National Security Personnel System
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I believe the proposed NSPS will hurt the mission of DoD and undermine Civil Service. As a DoD employee I fear that NSPS as proposed is nothing but a union-busting measure designed to make Civil Service become a buddy-system for those employees at the top.

One of my top concerns is that under the guise of "workforce shaping" employees with careers devoted to federal service will be treated unfairly if the current Reduction in Force (RIF) rules change. As I understand Subpart F, Sections 9901.6012 to 9901.611, RIF rules will be changed to negate seniority and become subjective to an employee's most recent appraisal score. This seems like age discrimination combined with the good ole boy system to me.

Another concern I have is the references in the Federal Register NSPS Proposed Rule published on

14 Feb. 2005 that refer to the attacks on Sep 11. I feel the DoD is able to continue protecting the citizens of the United States without such a revolutionary change in the way our DoD civilian employees are paid, staffed, classified (job systems), rated on performance, treated during adverse actions and appeals processes.

I do feel our personnel system needs reform in some areas. For example, I work as a management analyst for the Air Force. I keep metrics on how long it takes from the time I submit an action to fill a position in my organization to the time an employee reports for duty. On average, it takes four months. I don't think all the "flexibilities" proposed by NSPS will help if there aren't enough employees to staff the paperwork required to bring an existing employee to a new position or to bring an outside hire into the civil service.

I feel the individual pay increases for performance should continue to include guaranteed percentages like the Cost of Living Adjustments at the beginning of the year. I am concerned by the references in Subpart C about the pay bands having open pay ranges with no fixed step rates. I am also concerned that DoD will set local market supplements in lieu of

the current locality pay. I feel the timing of all pay increases should continue on an annual basis in order to allow sound financial planning by the dedicated employees of DoD as we strive to continue our existence as middle-class citizens.

Most of all I am concerned about Subpart 1 (Labor-Management Relations) Sections 9901.901 to 9901.929. I feel the labor management law that has governed my rights as an employee to organize and engage in collective bargaining has worked well since 1978. I see no reason to take away most of the collective bargaining rights or grievance rights. Please work to ensure a balance of power in the labor-management partnership. DoD should not create a hand-picked dispute board made up of one-sided thinkers.

Please work to ensure that DoD remains an employer of choice to those seeking federal careers by maintaining fairness and professionalism in all areas.

Sincerely,

Deborah L. Voss