

P.O. Box 725
Huntsville, AL 35804
March 9, 2005

Program Executive Office NSPS
ATTN: Brad Bunn
Suite B-200
1400 Key Boulevard
Arlington, VA 22209-5144

Dear Mr. Bunn,

I have previously submitted a number of comments through the National Security Personnel System website. I am adding a conventional letter to the body of comments on NSPS.

The NSPS is inadequate in content. There are too many important features of the program that are not presented in sufficient detail to properly understand the implications of the NSPS. A couple of examples of missing details are the assertion that the GS system will be scraped and replaced with broad pay bands. However, there is no definition of the pay bands! There is no definition of the aggregation of General Schedule series that will make up the occupational career groups! Even the ratings that a supervisor can give are missing. Are the ratings 5, 4, 3, 2, 1, or 0 or are the ratings just unsatisfactory? Both structures were alluded to, but no finite listing that a supervisor can describe an employee's performance as is given. There is no formula that allocates the pay pool dollars to each employee based on ratings share allocation. There is no definitive declaration how a rating adjusts tenure in a reduction in force. These are the most basic features of the NSPS. To understand how NSPS will operate over time, these details need to be presented during the public comment period before the implementation of NSPS, not after the implementation.

NSPS cannot stand alone, but requires extensive implementing documents to be understood. The NSPS, as published, is so poorly written that it fails to provide the limiting guidance for the preparation of the missing details. The holes are so big and so unconstrained that care must be taken to keep the future implementing documents from violating Congressional intent. For this reason alone, this Federal Register Notice needs to be withdrawn.

As a Vietnam Era veteran, I am alarmed at the degree that NSPS devalues and debases the concept of veterans' preference. Uniformed service in DoD is the primary vehicle where people become veterans. NSPS, as written, fundamentally damages the conventional understanding of what veteran's preferences is to such a degree that a new term should be used. What is done to veterans in NSPS is so radically different from current personnel structures that to use the term, veterans' preference, is misleading, confusing and wrong. Use a different term and please notify Congress that you are gutting congressionally mandated veterans protection.

One area with enough detail to predict how a feature will be used is the definition of competitive area during reductions in force. Allowing a competitive area to be limited to a business area or function opens the reduction process to be abused and to violate merit principles. If a small primary organizational element is the complete competitive area, then small competitive areas are acceptable. But given normal organizations, I recommend that a competitive area be no smaller than 50-75 employees.

The important feature of any personnel system is the accomplishment of work. So the arena of consideration is a fair supervisor, a willing employee, a set of performance objectives, and a fair evaluation. Everything is built upon those four elements. The personnel system must be structured with enough incentives and penalties to make supervisors better and employees more effective. Adding elements, such as contributions, which are allocated to the evaluation by personnel who are detached from the work group will be ineffective and, could be, detrimental to the accomplishment of the work. Focus on the work group. It is management's responsibility to stitch work groups into effective organizations and senior executives' responsibility to create effective agencies under the direction of the secretary. Change the focus of NSPS from Secretary and Department to a focus on work group.

I recommend that the February 14, 2005 National Security Personnel System Federal Register Notice be withdrawn. The NSPS should be re-written to provide the information that will describe the important features of the system before it is published again.

Yours truly,

A handwritten signature in black ink, reading "David A. Trenkle". The signature is written in a cursive, flowing style with a large initial "D".

David A. Trenkle