

15 March 2005

Program Executive Office
National Security Personnel System
Attn: Bradley B. Bunn
1400 Key Boulevard
Suite B-200
Arlington, VA 22209-5144

Re: Comments on Proposed NSPS Regulations – RIN 3206 –AK76/0790-AH82

Dear Mr. Bunn:

I am writing to express my opposition to proposed changes to work rules in the Department of Defense (DoD). The proposed regulations, known as the National Security Personnel System (NSPS), appear in the *Federal Register* on February 14, 2005. Please note that I am also sending this letter to my Congressional representatives.

I am very upset by the proposed NSPS. These rules would create a system in which federal managers are influenced by favoritism rather than serving the civil concerns of the American people. The employees at DoD, and indeed, at all federal agencies, are hard-working and committed. How will slashing worker rights advance the mission of DoD, or any other branch of the federal government?

Under the proposed system, federal employees could be assigned anywhere in the world, even into a war zone, with little or no notice. This would truly be a horrific situation. What has the civilian work force done to deserve this? Do the proposed rules apply to the authors of the proposal, or their extended families?

Although it is called "pay for performance," the proposed DoD system is more accurately called "pay for patronage." The amount of a worker's salary will depend almost completely on the personal judgment of his or her manager. This will encourage abuse, reward short-term outcomes, and discourage teamwork. Moreover, the proposed system provides no assurance that even the best workers will receive a pay raise, or that the pay offered will be fair or competitive. The proposed system will create a situation in which workers will be afraid to speak out about harassment, violations of the law, and workplace safety problems. As rights of appeal are reduced, we can expect an increase in abusive, patronizing supervisors in government.

The new powers to alter schedules is a further avenue for abuse, allowing managers to punish employees in this manner, circumventing the little remaining checks and balances associated with performance. NSPS will allow managers to schedule employees to work with little advance notice of schedule changes. This will make it extremely difficult for working parents to care for their children and family. How does this foster family life and family values?

Sincerely,



Richard Haworth
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