

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

Mail original to:

Program Executive Office

National Security Personnel System, Attn: Bradley B. Bunn

1400 Key Boulevard, Suite B-200, Arlington, VA 22209-5144

Mail a copy to:

AFGE Attn: MORE, 80 F Street, NW, Washington, DC 20001

FROM

Bradley B. Bunn  
1612 Glenwood Dr  
Moore OK 73160

General: I believe the proposed NSPS will undermine the Civil Service and hurt the mission of the DoD employees.

Subpart C Pay, Sections 9901.301 to 9901.373: The employees in DoD should continue to receive the same annual pay across-the-board adjustment that other GS/FWS workers receive.

The individual pay increases for performance should include guaranteed percentages in the regulations so that employees will understand the pay system and what their pay increase will be depending on their performance.

Subpart D Performance Management - 9901.401 to 9901.409: In order to insure fairness and accuracy, DoD employees should be able to appeal any performance rating to an independent grievance and arbitration process like they can do now.

Subpart F Workforce Shaping - 9901.6012 to 9901.611: DoD should not change the current layoff/RIF rules which give balanced credit to performance and the employees valuable years of committed service to DoD.

Subpart G Adverse Actions - 9901.701 to 9901.810: Due process and fairness demand that the independent body reviewing a major suspension as termination be allowed to alter the proposed penalty if they deem it to be unreasonable. The current standards approved by the courts to guide such bodies should continue to be used.

Subpart I Labor-Management Relations - 9901.901 to 9901.929: The labor management law that has governed the employees' right to organize and engage in collective bargaining has worked well since 1978. There is no compelling reason to take away most of the collective bargaining rights or grievance rights.

DoD should not create a "company dominated dispute board." Any dispute board must be "jointly selected" by management and the Union.

Sincerely,

Bradley B. Bunn



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**Add your comments below.**  
**American Federation of Government Employees, AFL-CIO**

This new pay system will greatly  
advance the good-old-boy network. It  
has no recourse for the person who isn't  
a friend of the supervisor. This new  
system has no good value to the current  
worker. Hand workers are pigeon holed  
and held back. This system didn't  
work back in the early 70's it wouldn't  
work now.

Wk Worker  
at Trike AFB

**Comments are due in Washington, DC on March 15.**