

**Comment on NSPS Now!**  
**American Federation of Government Employees, AFL-CIO**

**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

*William E. Pitts* ~~*William E. Pitts*~~  
Federal Police Officer  
Redstone Arsenal, Al. 35898

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,



P-0215

*William E. Pitts*

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

DHS/OPM HR System Public Comments  
PO Box 14474  
Washington, DC 20044-4474

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

To Whom It May Concern:

We write to express my concerns about changes to work rules in the Department of Defense (DoD). The proposed regulations, known as the National Security Personnel System (NSPS), were printed in the Federal Register on February 14, 2005. This message will be sent to both DOD and my representatives in Congress.

I William Pitts have been a federal employee for eighteen years. I Bill Gaines have been a federal employee for twenty four years. Both of us are veterans. We are angry that these proposals seem to treat the employees who help defend our country as the enemy. Most DOD employees work hard and are committed. We believe that mistreating the employees will hurt the agency's mission. We are very upset by NSPS. This system will change the way workers are paid, evaluated, promoted, fired, scheduled, and treated. These rules would create a system in which federal managers are influenced by favoritism rather than serving the civil concerns of the American people.

#### Annual Pay Raises

Under the General Schedule and FWS, employee pay was clear. It was funded by Congress and could not be taken away. However, NSPS will take away this certainty. Salaries and bonuses are funded by DOD. In the past – as recently as just last year – DOD did not fund its awards program. Given the agency's miserable record on this issue, how can employees feel confident that our salaries and bonuses will be funded in the future?

#### "Friend of the Supervisor" Pay System

With the new patronage pay system, which DOD calls "pay for performance," the amount of a worker's salary will depend almost completely on the personal judgment of his or her manager. This system will force workers to compete with one another for pay raises, which will destroy teamwork, increase conflict among employees, and reward short-term outcomes. There is no guarantee that even the best workers will receive a pay raise or that the pay offered will be fair or competitive. This system will create a situation in which workers are in conflict with one another and afraid to speak out about harassment, violations of the law, and workplace safety problems. Furthermore, there will be no impartial appeal system to assure that everyone is treated fairly.

#### Schedules and Overtime

NSPS will allow managers to schedule employees to work without sufficient advance notice of schedule changes. This will make it extremely difficult for working parents to care for their children and family. It will also mean that abusive managers could harass employees with bad schedules or short notice. Overtime rotations can be canceled, which means that employees may not be able to plan adequately for childcare and other important responsibilities.

Civilian Deployment

Federal employees could be assigned anywhere in the world, even into a war zone, with little or no notice. Public employees are proud to serve our country, but they are also responsible for caring for their families and personal obligations.

America is at war. We are fighting for democracy abroad. But these regulations are an attack on workers' basic rights. Furthermore, NSPS will divert the attention of defense workers from the soldiers' welfare to protecting themselves from abuse on the job. I urge you to force DOD to rethink this proposal. We need work rules that preserve fairness, serve the American people, and respect the rights of Defense Department workers.

We understand the concepts behind these changes, but apparently the person(s) that pursued these changes do not fully understand the consequences of their actions.

We can only speak for the work place where we work as to what is going to occur. We are Federal Police Officers working at Redstone Arsenal, Alabama. We have witnessed corruption, malfeasance of office, criminal acts, violations of current OPM regulations, discrimination, and violations of the civil service reform act just to name a few by members of management both past and present. We have been a few that have spoken out against their actions which have cost us any upward mobility and career. The implementation of nsps is only going to make a bad situation worse by empowering corrupt management officials.

The implementation of nsps at this time in our history can only serve to harm our national security, weaken our defense and the future of our country.

Sincerely,  
William E. Pitts  
Sgt, Federal Police Officer



Sincerely,  
Bill Gaines  
Sgt, Federal Police Officer

