

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

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Program Executive Office

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FROM

Linda Hill-Robinson

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I am writing to you because of my concern about the so-called National Security Personnel System (NSPS) scheduled for implementation for more than 700,000 employees of the Department of Defense over the next year. As you know, NSPS was authorized under the 2004 Defense Authorization Act, passed by Congress in November 2003. There is, however, a significant difference between the skeletal authorities that Congress approved and the sweeping new authorities that Secretary of Defense Donald Rumsfeld is now claiming. During congressional hearings on this issue, the Secretary asserted that the Pentagon's broad mission requires greater "flexibility" in hiring, disciplining, compensating and assigning civilian personnel.

In short, the Secretary wanted the same "chain of command" authority over civilian personnel as he enjoys over uniformed military personnel. Neither the Secretary nor his subordinates offered any concrete examples to explain how union rights might have impinged on the Pentagon's mission in the past.

Although Congress acceded to the broad requests lodged by the DOD, it attached certain strict conditions--including a specific requirements that DOD observe legal requirements of labor relations statutes and that they involve duly elected unions in the development of the new system. The Pentagon has done neither.

Although DOD has convened a dozen or more meetings to "brief stakeholders" and to "solicit the views" of unions, there has been no information sharing from DOD and absolutely no response to repeated union requests for specific information as to exactly what problems management wishes to address with the adoption of NSPS. I am certain that one of the Pentagon's objectives in advancing NSPS is to construct a so-called "pay for performance" system. This is another case of deceptive labeling. Various government agencies have been testing performance pay systems for more than 20 years and invariably, the results have been that the majority of workers feel cheated when advancement, promotion and pay decisions are given over to the sole discretion of a supervisor. The process typically reduces salaries and morale. It is too autocratic and eliminates any redress for decisions made on the basis of considerations other than merit.

For these reasons, I oppose the implementation of NSPS and I urge you to act to instruct the Secretary of Defense to halt any further development of NSPS unless and until the Pentagon is willing to substantively address the issues raised by the United DOD Workers Coalition.

Sincerely,

Linda Hill-Robinson

