

Monday, February 14, 2005

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

First of all, let me wish you a Happy Valentine's Day – it will probably be your last happy day for years!

My comments regarding the new NSPS have to do, not with a particular section of the proposed rules, but rather with the reality of managing and supervising federal employees in the real world; something I've been doing for almost 30 years – the NSPS won't work and it won't work for the following reasons:

- Most supervisors, in my experience, have other, primary duties to perform. Your NSPS envisions a sort of changing environment where goals and objectives may be set, re-set, changed, etc., all the while being communicated fully [yet not necessarily in writing] to all employees on a one on one basis to achieve maximum productivity. I, on the other hand, see supervisors weighed down in documentation, just to protect themselves from lawsuits, about who and what they've communicated to who and when with a resulting loss in their own productivity on their own jobs...not a pretty picture.
- Your system begins like a newly-launched ship with no barnacles but as lawsuits [lots and lots and lots of lawsuits] are filed and adjudicated, each precedent-setting case will become a barnacle on this fine new ship and its progress through the water will become slower and slower and eventually, it will sink.
- You are turning the civilian personnel system into a zero sum game yet you expect cooperation and teamwork from your employees – ain't gonna happen.
- Your expectation that the funds to pay all these bonuses and high salaries for stars will be there is naïve yet touching. Anything that is guaranteed, 'to the maximum extent practicable', is dead on arrival.
- You admit to basing a good deal of the NSPS on the Department of Homeland Security's new personnel plan...and we all know how well that is going.

I give your plan about three to five years before it implodes in a complete destruction of employee morale with its attendant effect on mission accomplishment and so many lawsuits that not even you can keep them all straight.