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84TH CONGRESS }  
2d Session }

SENATE

REPORT  
OF  
POST OFFICE ADVISORY COMMITTEE  
TO THE  
POST OFFICE AND CIVIL SERVICE  
COMMITTEE  
ON  
THE ADMINISTRATION OF  
PUBLIC LAW 68



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LETTER OF TRANSMITTAL

JULY 25, 1956.

Hon. OLIN D. JOHNSTON,  
*Chairman, Senate Committee on Post Office and Civil Service,  
Senate Office Building, Washington, D. C.*

MY DEAR MR. CHAIRMAN: I am attaching herewith a report of the advisory committee appointed by you to review the report on classification actions by the Post Office Department, which resulted in the downgrading of employees under the recent Postal Salary Classification Act, Public Law 68, 84th Congress.

The task of the committee in evaluating this legislation has been far greater than expected. The difficulties arising from the fact that many decisions are only now being made has made it impossible to prepare this report at an earlier date. The complexities and magnitude of the assignment make it inevitable that some supplementary reports will be necessary and it is believed that the advisory committee should continue to function for that purpose.

This report makes certain recommendations which will require legislative action and it is our opinion that the staff of the Senate Committee on Post Office and Civil Service should be empowered to prepare such legislation while the Congress is in recess so that necessary bills can be introduced early in the 1st session of the 85th Congress.

Your advisory committee is appreciative of the honor conferred upon them by your appointment.

With kindest personal regards, I am  
Sincerely yours,

E. C. HALLBECK,  
*Chairman, Advisory Committee.*  
WILLIAM C. DOHERTY,  
PAUL M. CASTIGLIONI,  
PAUL A. NAGLE,  
THOS. G. WALTERS.

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*No mail handler.*

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REPORT OF ADVISORY COMMITTEE TO THE SENATE COMMITTEE ON POST OFFICE AND CIVIL SERVICE, ON PUBLIC LAW 68, 84TH CONGRESS

Your committee has considered at great length the operations and administration of Public Law 68 and has reached a number of conclusions with respect to that act.

We find that in the administration of this act, many of the fears expressed prior to its enactment have been borne out. In announcing the appointment of this committee, you emphasized that the advisory committee was to look into classification actions that resulted in the downgrading of employees and, happily, the provisions of section 504 of the act have thus far served to prevent a reduction in the compensation of employees on the rolls on the effective date of the act. However, this does not mean that positions are not being or may not be downgraded when vacancies occur and such positions are filled by new employees. This feature will be explained later in this report.

Section 202 of the act provides for appeals to the Civil Service Commission whenever an employee is placed in a position other than a key position as described in section 203 of the act in order to determine whether such position has been placed in its appropriate salary level, or whenever an employee, who has been placed in a key position, believes that he has not been correctly placed in such position on the basis of and in accordance with the descriptions of key positions contained in section 203 of the act.

Under this section, 767 appeals had been filed with the Civil Service Commission as of a recent date; 550 of these appeals have been decided and 217 remain on hand awaiting a decision. Of the 550 appeals decided, 514 were decided in favor of the Post Office Department and 36 in favor of the employee. The effects of these 36 favorable decisions will be discussed later in this report.

Section 205 of the act required the Postmaster General to transmit to the Congress on or before January 15, 1956, a comprehensive report of operations. Under date of January 13, 1956, Postmaster General Arthur E. Summerfield transmitted his report to the President of the Senate. In this report, it is noted that 14 employees were assigned to key position 6, file clerk, and 34 employees were assigned to key position 7, typist, for a total of 48, and of this number, 46 had been previously described as clerks in one form or another, while one had been described as a junior mechanic and another as an elevator operator. Similarly, 24,528 employees were placed in key position 8, PFS level 3 as mail handlers, and of this number, 29 had been previously described as clerk or substitute clerk in first-class offices; 6 had been described as postal transportation service clerks; 9 as watchmen, and 1 as a laborer, for a total of 45; the balance of 24,483 having previously been described by occupation, title as mail handler or substitute mail handler, messengers, and watchmen.

Thus it appears that out of 24,576 employees who were placed in level 3, only 47 had previously held positions which may have been

ranked in a higher salary bracket. This is indicative, in our opinion, of just how serious were the inequities referred to by the Post Office Department in their testimony in support of this legislation.

In their presentation to the Congress, outlined in the pamphlet Salary Plan--Schedules and Statistical Comparisons, the Post Office Department estimated the number of file clerks, then in the \$3,270 to \$4,070 bracket, who would be placed in level 3 at 1,250, while the number of typists then in the \$3,270 to \$4,070 bracket who would also be placed in level 3 was estimated at 125, for a total of 1,375 positions. From their own report, therefore, it would appear that the Department overestimated the number of such positions by some 2,900 percent.

The inequities that have resulted from the act appear to far outnumber those that existed prior thereto. These inequities fall into four general patterns, as follows:

Inequities which result from conversions as compared to promotions.

Inequities resulting from promotions to different PFS levels.

Inequities resulting from the assignment of a given position to different salary levels in different offices.

Inequities that result from positions being susceptible to classification in more than one salary level.

Public Law 68 contains several clear inequities and numerous others that are less apparent. A clear inequity is the peculiarly contradictory condition resulting when a person promoted to a given level subsequent to December 3, 1955, receives a higher salary than one converted to that level on December 3, 1955. Another clear inequity is the evident legislative error whereby Postal Transportation Service substitutes are stopped at step 4 of level 5 instead of at step 5 of level 5, which latter stopping point would be more nearly in conformity with the apparent intent of the law.

Two features of the administration of the act have aroused widespread discontent among the employees. First, the setting of the effective date of the legislation brought about the ridiculous result that newly hired substitutes were paid at a much higher hourly rate for services performed on December 1 and 2, 1955, than regular career employees with long years of service. Under Public Law 134 of the 79th Congress, employees in the field postal service were paid on the basis of a 360-day year and were paid for Saturdays and Sundays whether or not service was performed on those days. This resulted in an hourly rate of pay equal to the annual salary divided by 2,880 hours.

Public Law 68 authorized the Postmaster General to determine the effective date of the change in pay periods and the reclassification provisions of the act at any time within 180 days of enactment. Acting upon the authority granted by the act, the Postmaster General made the act effective on December 3, 1955, a Saturday. This resulted in employees being paid at the 360-day rate for December 1 and 2, but denied them pay for Saturday and Sunday, December 3 and 4, which would have been required under Public Law 134. Public Law 68, by changing the method of payment, does not provide pay for Saturday or Sunday service. The net result was that regular employees (and distinguished from substitutes) received an hourly rate of pay for services on December 1 and 2 on the basis of a year of

2,880 hours, rather than an actual work year of 2,016 hours. The average loss to each employee is something in excess of \$4.50 per cent for each of these days.

The second cause of discontent arises from section 403 (1) of the act, which provides that--

Each employee in the automatic grades who had not reached the maximum grade for his position under the provisions of the Act of July 6, 1945, as amended shall retain the anniversary date established for his next automatic promotion under such Act unless the amount of increase in basic salary which he receives upon adjustment to the appropriate schedule is equal to or greater than the difference between the salary for his automatic grade and the next higher automatic grade for his position under such Act.

Employees maintain and we agree that the language "shall retain the anniversary date established for his next automatic promotion under such Act" means the dates January 1, April 1, July 1, and October 1, as provided by the act of July 6, 1945. The Post Office Department, however, has interpreted the act to mean (see Post Office Bulletin, December 12, 1955) the beginning of the first pay period following the former anniversary date which resulted in automatic promotions due on January 1, 1956, becoming effective January 1, 1956; promotions that were due on April 1, 1956, becoming effective on April 7, 1956; promotions due on July 1, 1956, becoming effective July 14, 1956; while promotions that will be due on October 1, 1956, will become effective on October 6, 1956. While this may appear to be a minor or even trivial matter, the fact remains that many employees are being denied earned salary increases for varying periods of time and that this condition will continue until such time as they reach the top automatic grades. We believe this is contrary to the plain and unequivocal language of the law.

Section 606 (b) provides that--

Each substitute, hourly rate, and temporary employee who reports for duty in compliance with an official order shall be employed for not less than two hours following the hour at which such employee is ordered to report.

This language appears to be clear and unequivocal. An employee shall be employed for not less than 2 hours whenever he is ordered to report. Nevertheless, we have found many instances where the requirement is being circumvented. The district operations manager at Charlotte, N. C., advised postmasters at first-, second-, and third-class offices, under date of April 17, of a ruling which was to be published as soon as practicable in the Postal Manual but was furnished in advance for immediate application. This ruling was explained as follows:

P. P. 51-145. (a) The requirement that hourly rate employees be employed for at least 2 hours following the hour in which the employee is ordered to report is satisfied so long as the minimum 2 hours of employment is performed and if a shorter period of service is agreed upon for mutual convenience, by the appointing officer and the employee, the employee shall be paid only for the time actually worked.

Under the above ruling it is permissible to employ a substitute less than the required 2 hours after reporting, if there is a mutual agreement between the postmaster and the clerk. It is suggested that a written agreement be obtained and placed in your office file.

In at least one office (Winston-Salem, N. C.) this led the postmaster to prepare a mimeograph agreement addressed to himself, reading as follows:

POSTMASTER,  
Winston-Salem, N. C.:

I hereby agree that it is satisfactory with me to be employed for less than 2 hours, as stated in the third paragraph of the reproduced letter which I received a copy dated April 17, 1956, subject, Minimum Employment for Hourly Rate Employees.

Please complete in own handwriting.

Date ----- Name of employee -----  
(Employee's signature)

-----  
(Official designation)

Date filed -----  
Approved -----  
(Postmaster)

This can hardly be considered anything other than an attempt to circumvent the plain language and intent of the law.

Similar complaints have been received from other sources and there can be no doubt that substitutes are in a great many instances being denied the minimum hours of employment guaranteed by section 606 (b).

In the matter of appeals to the Civil Service Commission, as provided in section 202 of the act, decisions have uniformly been against the employees with only 36 exceptions to date. However, the Department appears to be trying to circumvent even the few favorable decisions wherever possible.

In one instance, an employee originally ranked in PFS level 4 was, upon appeal, placed in PFS level 5. As of December 2, 1955, he was receiving a salary of \$4,208 per annum. Effective December 3, his salary was increased to \$4,285 per annum in PFS level 4. He has been advised that, as a result of his appeal, his salary will be reduced from \$4,285 to \$4,255, even though he is performing work of a more difficult nature.

In another instance, an employee was advised that his salary grade had been certified to the Department by the Civil Service Commission as assistant to the postmaster, PFS level 5. In this instance, the postmaster was advised that his office does not meet the full requirements for the authorization of the position. In other words, despite the decision of the Civil Service Commission, the employee is to be denied the benefits solely because the Department has not seen fit to authorize a given position despite the fact that the Civil Service Commission has held that the employee is performing the necessary duties of such position.

In still another instance where the Civil Service Commission rendered a favorable decision, the district manager immediately called upon the postmaster, telling the postmaster that he would have to take over all of the duties that the employee was performing that did not come under the classification of window clerk, key position 13, and instructed the postmaster to write the Commission that such action was being taken and retracting the postmaster's prior approval of the employee's appeal for an assistant postmaster classification.

It will thus be seen that even in those rare instances where favorable decisions are received, the Department has taken immediate steps to

nullify any benefits which accrue to employees as a result of favorable action on their appeals. This indicates a hard-headed determination on the part of the Post Office Department to have their own way regardless of any actions taken by the Civil Service Commission.

In a number of instances, employees in offices not having an assistant postmaster have filed appeals as provided in section 202 of the act on the ground that they were performing the duties of an assistant postmaster.

In some few instances the Civil Service Commission has upheld their appeal and advised the employees that their duties were comparable to those of assistant postmaster and certified to the Post Office Department, as provided in the act, their finding that the employee should be placed in salary level PFS-8.

In one such case, an employee received a letter from the Civil Service Commission, dated May 1, advising him of the favorable decision, and 2 days later, on May 3, a representative of the district manager's office personally interviewed the postmaster and the employee concerning the duties. The following month, the district operations manager advised the postmaster to submit form 820 of the employee, reminding him that "care must be used in describing the duties to reflect the level 5 position and that they should as closely as possible describe key position reference No. 17, standard position 2-186." This standard position description is not one described in the report of the Postmaster General under date of January 13, 1956. The employee was advised that he could either abide by this decision or stay in his present level and another employee would be assigned to the level 5 position.

In this instance, the Department has apparently attempted to circumvent the decision of the Civil Service Commission by writing up a job description that fails to reflect the actual duties being performed.

The inequities that result from conversion are numerous and times exasperating. In the city of Minneapolis, a clerk was apparently misclassified as a special distributor and on December 3, 1955 was placed in level 5, step 5, with a base salary of \$4,380. Had he been converted in level 4, his base salary would have been \$4,410, \$30 a year more. However, the clerk expressed a willingness to revert to the level 4 position, believing, naturally, that his salary would be adjusted to a base of \$4,410, only to learn that upon conversion he would be placed in step 6 of level 4 with a base salary of \$4,285, \$125 a year less than he would have received if he had been correctly classified on December 3. We submit that this is a ridiculous situation.

The mechanics of promotion actually result in instances where a person who goes to an intermediate level receives a larger immediate increase than he would have received had he gone to a higher level.

The inequities become even more apparent in the higher levels. For example, in the Postal Transportation Service, a general foreman second grade, would have been converted on December 3, 1955, from an annual salary of \$5,421 to a rate of \$5,570 (step 5, level 8). A general foreman, third grade, would have been converted on December 3, 1955, from an annual salary of \$5,190 to a rate of \$5,305 (step level 7). If, then, the latter individual is subsequently promoted to level 8 on January 1, 1956, he advances from \$5,305 to \$5,740 (step

level 8) or an annual salary almost \$200 greater than that paid to one who may have been in an equivalent position for many years.

It appears that the most equitable way to overcome such disparities is to extend to persons in a given position on December 3, 1955, the appropriate credits for time served in their equivalent positions. If the act is to be adapted to meet this objective, it might properly be amended as follows:

Amend section 304 by the addition of the following paragraph to be numbered section 304 (c):

"Each employee whose basic salary is paid under the Act of July 6, 1945, as amended, and whose position under the Act of June 10, 1955, is allocated to salary level PFS 10 or a lower salary level in the PFS schedule, and who, on or prior to December 3, 1955, has, in accordance with the provisions of section 401 (a) of the Act of June 10, 1955, earned but has not been credited with service in a position equivalent to that occupied on December 3, 1955, shall be given credit for such prior service in the same or equivalent position in the manner of computation prescribed by section 401 (a) of the Act of June 10, 1955."

Another serious inequity that has developed applies to certain craft (blue-collar) employees who have heretofore been paid wages based on the wages paid for comparable work in the Bureau of Engraving and Printing and the Government Printing Office. These wages, in turn, result from collective bargaining under the provisions of the Kiess Act between the Government Printing Office and the Public Printer. For example, certain toolmakers are placed in the top step of PFS level 8 which would indicate an increase of \$60 per annum. However, close scrutiny reveals that these people are frozen at this salary despite any increases that may be given for comparable work in other Government departments and agencies unless the Congress, through legislative action, increases the amount provided for level 8 wages.

Another example is that of machinists who were placed in step 7 of level 7 with an annual wage of \$5,460. These employees are presently receiving approximately \$5,700 per annum and, as a result of section 504 (a), are in a "saved" rate which precludes their salaries being reduced. However, any increases granted employees doing comparable work in other Government departments and agencies would not become effective for these employees until the wage provided in level 7 is increased by a minimum of \$240 per year.

A further inequity arises from the fact that the act recognized the need to recruit Postal Transportation Service substitutes at the level 5 rate in order that there might be no problem about their being placed in either the level 4 or level 5 positions which comprise the bulk of Postal Transportation Service assignments. The thinking was that such substitutes should progress upward through level 5 to the point at which—were they to progress further—a reduction in salary would be indicated were they to accept regular positions in level 4. In the amendment process prior to enactment, changes were made which resulted in a ceiling on the advancement of Postal Transportation Service substitutes at one step lower than that which might have been reached under the principles outlined. There was also created a situation wherein career substitutes in the category under discussion were stopped at the cited step and who, as a result, are currently receiving an annual rate of \$4,255 (step 4, level 5), an amount \$155 lower than the top step of the lower of the 2 levels (4 and 5) in which Postal Transportation Service employees commonly are placed. Accordingly, it seems proper to consider certain special benefits to employees on the

rolls on the effective date of the act. This policy has been reflected in changes made in the longevity principle from the time when that principle was first established. With each succeeding change in that legislation, the statutes provided a continuation of previous practice for persons previously earning meritorious grades on a basis different from the formula then being created for determination of longevity pay. Accordingly, it is proposed that the spirit of Public Law 68 be given more adequate expression and that the inequity to Postal Transportation Service substitutes be corrected through the following amendment to Public Law 68:

Amend section 401 (c), line 5, following the word "section," by inserting the following:

"but such substitute shall not be advanced beyond step 5 of salary level PFS-4 except that employees on the rolls on December 3, 1955, who are otherwise eligible under the Act of June 10, 1955, shall be advanced to step 7 of salary level PFS-4."

The amended section would then read:

"(c) Each substitute employee in the Postal Transportation Service, whose position is allocated to salary level PFS-5 as a distribution clerk in a railway or highway post office, shall be advanced in the manner prescribed for other employees under subsection (a) of this section, but such substitute shall not be advanced beyond step 5 of salary level PFS-5 except that employees on the rolls on December 3, 1955, who are otherwise eligible under the Act of June 10, 1955, shall be advanced to step 7 of salary level PFS-4."

One of the most frequent causes of complaint arising from the act is the practice of assigning employees within minimum skills, who are paid a lower salary rate, to duties which require a considerable amount of training and which are compensated at a higher rate. During the hearings on postal salary legislation, it was charged that the legislation was designed to give a free hand to the Postmaster General in the assignment of employees at a rate of pay to be determined by him. We believe experience supports this view.

Under section 203 of Public Law 68, key position 8, mail handler level 3, we find among the duties and responsibilities (f) (ii): "make occasional simple distribution of parcel-post mail requiring no special knowledge." In the report of the House Committee on Post Office and Civil Service, which accompanied the bill S. 2061, Report No. 728, June 2, 1955, Mr. Murray referred to an amendment on page 13, line 17, which inserted the word "occasional" after the word "makes." Explaining this amendment, the report stated:

The first amendment merely affirms the view of the committee that the simple distribution of parcel-post packages by mail handlers is an incidental (occasional) rather than a primary function.

In the printed hearings before the Senate Committee on Post Office and Civil Service, Senator Pastore had occasion to ask Assistant Postmaster General Lyons the following question, "Who is going to determine what occasional means? Occasional may mean 6 hours a day." In the reply of Mr. Lyons, which is to be found on page 10 of the printed hearings, you will note that Mr. Lyons was very careful to say that the use of the word "occasional" means that an employee could not perform "regularly 5 minutes a day" higher level duty without getting paid for it. Despite the clear intent of the law, as explained in the report of the House Committee on Post Office and Civil Service, and despite the assurances given to the Senate Committee on Post Office and Civil Service by the Assistant Postmaster General, Bureau of Personnel, we find that in many instances men

handlers are being assigned to full-time duties on parcel-post distribution.

The district operations manager at St. Louis, Mo., in reply to a complaint, made the statement that--

Mail handlers who currently are assigned full time or substantially full time to the simple distribution of parcel post, requiring no scheme knowledge, will continue to be designated as mail handlers and ranked in PFS level 3. The law is not interpreted as requiring any change in work assignments.

There has been a strange reluctance on the part of the Department to accept the intent of Congress in the use of the word "occasional." In meetings and correspondence with employee organizations, the Post Office Department now maintains it to be proper for mail handlers to perform distribution on a full-time, around-the-clock basis. Departmental reasoning appears to be that Public Law 68 contains no position description covering unskilled distributor assignments, that were there to be such positions, they would be at level 3, the mail-handler level. The Department has actually spoken of plans for a new job description such as "mail sorter" in order to put simple distribution at level 3. This is in contrast to the statement during the course of the hearings that--

This bill significantly curtails the Department's present authority which permits changes in salary by merely changing the employee's job title.

Your advisory committee believes that we are witnessing an excellent example of the kind of double-talk now being indulged in by the administrators of the postal service.

The advisory committee has received many complaints from clerks in airmail fields and Postal Transportation Service terminals, as well as dispatchers in post offices, with respect to their classification as distribution clerk, level 4, key position 12.

These complaints are based upon the fact that approximately 80 percent of their duties are more accurately described by key position 16, distribution clerk, RPO or HPO, level 5. The actual duties of these two positions are practically interchangeable, the basic difference being limited to the fact that one employee performs service in a standing installation, while the other operates from a moving floor either on a train or a highway post office vehicle. A considerable number of these employees have filed appeals with the Civil Service Commission, as provided in section 202 of the act, and these appeals have without exception been rejected. Appeals to the Department, Bureau of Personnel, have resulted in a similar rejection, it being held that the position was properly ranked as distribution clerk, PFS 4, by reference to key position 12.

In explaining this decision, the regional personnel manager at Chicago told one appellant that --

This decision was based essentially on the fact that key position 16, PFS-5, is restricted by congressional definition to distribution clerks assigned to RPO's or HPO's. Similarly, distribution clerks utilizing scheme knowledge in post offices, terminals, and airmail fields have been evaluated in salary level PFS-4 by the definition of key position 12. The Civil Service Commission has confirmed the Department's interpretation of the law as it relates to positions of this type by its decisions on numerous appeals.

What was left unsaid is the fact that the restriction "by congressional definition" resulted almost entirely from the Department's insistence that their description of key positions remain unchanged.

The only essential difference between key positions 12 and 16 lies in the fact that one necessarily involves certain travel and, therefore, an additional hazard. We feel that employees should be compensated for the inconvenience and hazard but that this compensation might more logically have been made a part of section 607 in the form of added compensation for employees assigned to road duties.

In departmental testimony before the House Post Office Committee on February 1, 1955, it was declared:

The new plan will eliminate the inequities inherent in the present inflexible system which requires assignment of all employees to a limited number of job titles.

By December of 1955, the Post Office Department had written in a letter that it could not approve a request for upgrading of certain Postal Transportation Service assignments from level 4 to level 5 that--

it is evident that the positions \* \* \* are basically distribution clerk positions such as those described in key position 12 (and) the assignment of those positions to level 5 would indeed be a departure from the letter and spirit of Public Law 68.

It may be true that placement of all key position 12 assignments at level 5 would "be a departure from the letter and spirit of Public Law 68," but it is no less true that failure to advance to level 5 representative group of such positions is an indication that the spirit of the law is being lost.

In testimony before the Post Office Committee, the Department further stated:

The salary plan, which will place the wages for postal service positions in proper relationship to each other so that inequities will be eliminated, incentive for advancement offered, and the principle of higher pay for more difficult work followed, is a vital part of an overall personnel program to make employment in the Post Office Department attractive in the light of a comparison with compensation and other inducements offered by private industry.

We believe that the concept of "incentive for advancement" is completely ignored in the salary levels comprising the vast bulk of a postal employees. It is submitted further that the current problem is not the one of distortion through wholesale upgrading but rather that the distortion arises because of the Department's failure to follow through at the most vital points on its announced program "higher pay for more difficult and responsible work."

One of the more glaring inequities under Public Law 68 result from the salary level to which clerks in offices of the third class have been assigned. One of the alleged advantages of this legislation was supposed to be that it would make it possible to provide equal pay for substantially equal work and give effect to substantial differences in difficulty of the work to be performed, in the degree of responsibility to be exercised, in the scope and variety of tasks involved, and in the conditions of performance.

Clerks in offices of the third class daily perform a large variety of tasks and exercise responsibilities far greater than many of the described in key position 4. Many of these employees are in fact if not in title, postmasters and assistant postmasters and regularly perform as a part of their daily duties all of the functions described in key position 12, distribution clerk; key position 13, window clerk; key position 18, postmasters, small third-class office; and key position 22, postmaster, third-class office. The salary level to which the

employees have been assigned, however, reflects not their duties and responsibilities but rather an alleged economic advantage supposed to result from a lower cost of living in their communities.

As an example of the inequities that result from the assignment of a given position to different salary levels, we might cite the case of dispatchers in the Motor Vehicle Service. Dispatchers in the Motor Vehicle Service have been placed in level 7, with three notable exceptions. The exceptions are made notable by the fact that this position is standard and the employees holding the position perform identical service in each instance. Nevertheless, in three different cities—Harrisburg, Pa.; Washington, D. C.; and Seattle, Wash.—Motor Vehicle Service dispatchers have been placed in individual position allocations IP 50-44, IP 50-48, and IP 50-55 in PFS level 6. If these post offices were in extremely small or medium-sized cities, it might be argued that the workload was so small as to warrant a salary for the position different from that in the larger cities. However, if the concept of equal pay for equal work and responsibility is to be adhered to, then certainly there should be no difference between the salary of an employee performing a specific task in Washington and the salary of an employee performing the same specific task in Baltimore, Md., or Richmond, Va.

We believe this is an entirely unjust action which singles out three individuals for treatment different from that accorded others performing the same tasks throughout the country.

In the case of postmasters, some rather odd situations develop as a result of the allocation to standard positions.

Standard position 2-7, postmaster, first-class office, is placed in salary level PFS-8 by reference to key position 25. Key position 25 covers a postmaster in a second-class office with receipts of approximately \$16,000 and approximately 6 employees. Standard position 2-7, however, has receipts from \$40,000 to \$55,000 and approximately 6 employees.

Standard position 2-9 covers postmasters at a second-class office and has been placed in salary level PFS-9 by reference to key position 27. Key position 27 covers a postmaster at a small first-class office with approximately 16 employees and annual receipts of approximately \$63,000, while standard position 2-9 deals with receipts in excess of \$30,000 and more than 10 employees.

In contrast, standard position 2-8, postmaster, second-class office, has been assigned to salary level PFS-7 by reference to key position 22. Key position 22 covers a postmaster at a third-class office with 2 clerical employees and annual receipts of approximately \$6,000, while standard position 2-8 covers an office with fewer than 6 employees and annual receipts of \$8,000 to \$14,000 that may or may not have rural delivery service within its jurisdiction.

It will thus be seen that many hairline decisions must be made in the assignment of postmasters to proper salary levels, with abundant opportunity to favor or punish according to the likes and dislikes of those who make the allocations.

Your advisory committee is of the opinion that the real difficulties with respect to Public Law 68 will become more apparent as time goes on and that there is a great need for a continuing study of developments along this line.

We believe that some consideration ought to be given to the number of individual position allocations which were referred to the report of the Postmaster General under date of January 13, 1968. Of that date, almost 4,000 positions had been individually allocated and these positions appear, in many instances, to have been adequately covered by key or standard position descriptions. Giving them individual ranking could only result in raising or lowering competition, which amounts to allowing those in authority to change the ranking whenever they are so inclined. This feature is especially susceptible to political or other manipulation and should be carefully watched to prevent the development of abuses.